

## New Development Guidelines for Town Published for Consultation Response to Questions from a member of the public, 10th June 2008

1 Is the purpose of this guidance clear?

Yes.

2 Is it clear how this guidance relates to other plans and proposals for the town of St Helier?

Yes and no. EDAW should only be used as a starting point. There is a danger if some proposed policies are “cherry picked”. The current political atmosphere is busy. Should there be a low response to this consultation, this must not be interpreted as a blanket endorsement for EDAW. I refer to WMUD in the appendix.

EDAW's report contains some useful work but I believe it also has flaws. I question the validity of some of its research method. I think it is inappropriate to accept some of the PBA traffic consultants' recommendations, whilst ignoring others which are interdependent proposals. Controversial issues such as the limited provision of parking and pedestrianising the core of town must be properly researched and debated before an informed decision can be made.

3 Do you agree that residential development should be the main driver for regeneration in St Helier?

Yes, in tandem with the delivery of other community needs, a shared vision and a business plan.

4 Do you think that the St Helier Street Life Programme – which has delivered improvements to the town's streets and spaces in places such as Colomberie, Charing Cross and Broad Street – should be extended to other parts of the town? If so, where?

Yes, I think that the Street Life Programme has brought benefit. I believe that it also poses threats to social and economic activity in St Helier if it is treated as an isolated mechanism. It must be remembered that the Street Life Programme was rejected in 2001 and amended before it was adopted by the State in 2002. The revised terms of reference called for the “big picture” of traffic management in St Helier and years later, I think that this remains undelivered. For example, preparing the traffic model for Street Life at the time, only the 1992 traffic flow was available. A study utilizing the revised 2007 model on how town traffic could change remains a work in progress. This is not to discredit current research, but as evidence to the observation of historical political nonchalance to provide basic research tools to inform the challenging planning process we are in. Basic transport infrastructure planning must now be prioritized.

5 Do you support the restoration of multi-occupation town houses (from flats and lodging houses) into family homes?

Yes, subject to the cost being of proportionate gain. Any government intervention might be more fruitful in the new build of larger family units, if that is a category where there is social demand.

6 Do you support the redevelopment of those sites identified in the report? If not, which sites do you disagree with and why?

Optimize the use of the sites once the infrastructure around it is available; public amenities, transport provision etc.

7 Do you agree with the approach that would ‘reward’ excellent design with planning permission for higher development yields?

Yes, given that appropriate public space and community facilities are provided, which will “offset” negative aspects of high density housing. Higher development yields could be achieved by taller buildings. Residential accommodation unit’s footprint should be made with a larger area than the current minimum requirements, if they are to be more attractive.

There should be a strong focus on creating an inclusive community. Potential residents should be involved in design from concept. These must be desirable homes in an attractive environment or the becoming the slums of the future.

**8** Do you support the introduction of a greater flexibility in the requirements for car parking and out amenity space, for new residential development, to encourage the redevelopment of urban sites the regeneration of St Helier?

Car usage is a difficult debate which the community must have. The planning process must not make simplistic or arbitrary conclusions on parking provision. Transport infrastructure is a basic priority need. If car usage is denied, demand must be clearly quantified and alternatives offered.

**9** Do you support the proposed parking guidelines for residential, office and retail development in town? Please explain your answer.

No. The proposed provision in EDAW (or lack thereof), must be justified. Parking remains a critical resource.

### **Residential Parking**

Increased residential density with lower parking provision has to be managed in a way in which the negative aspects are outweighed by the positive amenity gains, or the policy risks making the new area unattractive to potential residents.

### **Commuter Parking**

Market research may be necessary to make a balanced judgment. If there is an area where car usage may be “squeezed”, I think it may lie with commuter parking. This must be in balance with the policy to maintain St Helier as the Island’s main business centre and restrain migration of where organizations may wish to locate as convenient places to work. I accept the 500m car park-to-office planning guidance and other measures designed to encourage the commuter to opt for alternatives to the private car. We also need to be realistic about finding solutions for transport, what is achievable in a small community when we benchmark ourselves against city populations and the constraints of our temperate climate.

### **Shopper Parking**

More market research is necessary and EDAW acknowledges the “...need to take account of commercial reality”. In my view there is a migration of commerce (and food shopping in particular) from the Bath Street “axis” which is primarily associated with access difficulties. I fear that coupled with a migration of office workers’ footfall to the Esplanade and proposals for increased pedestrianisation measures, retailing and economic activity in this area will be in great decline and valued services lost.

I believe the retail reports published to date on behalf of government, very badly underestimate the economic and cultural relevance and the wider environmental benefits the Markets bring to Island life. This consultation exercise should not be used to ratify extensive expansion to pedestrian zones in the core of St Helier without accounting for the detrimental social and economic impact of those proposals across the Island. I acknowledge that there is important retail study in progress. I also note that there are simple research tools that have not yet been applied.

I reject the 300m car park-to-shop planning guidance as unacceptable for food shoppers and I strongly challenge that this presumption be demonstrated and debated.

The general provision of parking along the Bath Street “axis” appears to remain neutral and this in my view is inadequate to shoppers’ needs and aspirations. Putting the majority of car parking for the Bath Street axis on one site could be high risk in the event of interruption. The provision (or lack) of parking have far reaching consequences that must be debated.

The ITTP must be adequately resourced. The States have failed to fully deliver the “big picture” promised by Street Life. Further research is currently announced. It is a continued disappointment to me that both transport and retail research seems to be an after thought behind the other strategic drivers.

St Helier must be serviced efficiently and changes should only be effected in close consultation with industry.

Measures to exclude convenient car access to St Helier constrain people and business. It frustrates efficient day to day life, threatens to turn shoppers into petty criminals and displaces traffic problems elsewhere.

**10 Do you support the proposed guidelines for the provision of amenity space as part of residential development in town? Please explain your answer.**

Yes, with appropriate public space and community facility this will alleviate and “offset” negative aspects of high density housing. The Town Park should not be treated in strategic isolation of all the opportunities that are available.

A vast open area on Fort Regent remains a superb opportunity. It appears to remain an embarrassing and expensive burden. It is an enigma that sits tantalizingly close at one end of the Bath Street “axis” was linked by high speed lifts at Snow Hill, it could be a useful complement to a new urban residential district, providing unique open vistas, gardens for relaxation and encourage the use of existing leisure and sport facilities. I believe the lifts would bring a significant increase of usage to the Fort. There would be an improved opportunity to focus on youth leisure and support services infrastructure. Increased footfall could stimulate private investment and also improve the potential of the Fort as an all weather leisure and commercial visitor facility. Snow Hill is readily accessible to key, high volume tourist hotels that also face a “disconnect” with the shift of new investment to the Waterfront.

**11 Would you support the demolition of a protected historic building to enable the redevelopment of urban site? If so, what circumstances would justify any such demolition?**

Yes, if there are greater needs in the community. The uniqueness of the building and architectural relevance must be balanced. Expert opinion should be explained to the public; for example, as a layman I see little merit in saving the entire old Odeon site and I question the value of St James if there are adequate facilities elsewhere.

**12 Do you support greater flexibility in the application of planning standards (for car parking and amenity space) to encourage the change of use of office or other commercial uses to residential use?**

The social and economic impact must be weighed and the sites must be attractive to potential residents.

**13 Do you think that these guidelines are comprehensive? Is there anything missing?**

The wider benefit of the Waterfront investment boost and transport need must be used to form a wide ranging cohesive strategy to build a new community for the old town. *Please see conclusion below*

**14 What do you think is important if St Helier is to become a ‘vibrant, compact and characterful’ town that people will consciously choose to live in?**

I think there are different views on the definition of vibrancy. There are relatively simple tools that could be used to better measure the public's perception and need.

For some vibrancy is carnival, banners and street theatre. Such things can be a welcome enhancement. However we should not lose sight of the everyday operational functions if our community is to be successful. It may seem mundane, but it is necessary.

For me "vibrancy" means having a high quality of life community, peaceful, prosperous and efficient: "compact" is a given fact of island life, that can be made tolerable by finding "escape" through the open space environment; the sea, its shore and countryside: and "characterful" is our uniqueness, proud independence, culture and history.

## **Conclusion**

I am concerned that some of the current planning principles, assumptions and investment should not be ahead of a cohesive strategy for all of St Helier (and by inference the Island). I am grateful for the opportunity of this consultation. It is another objective step in this process.

Government can not bring about the unprecedented change that is on the near horizon by itself. It must build and continuously review its partnerships and help to create a vision shared with the community and commerce.

I repeat my recommendation that we should employ an agency such as the Association of Town Centre Management, which could facilitate and mentor the incredible time of change we are about to embrace.

I endorse the conclusions of the Urban Character Appraisal by Willie Miller Urban Design (WMUD) (Pages 24 and 259).

Links via the States Website (ctrl + click to follow):

[http://www.gov.je/NR/rdoonlyres/F3CD4ED8-340E-4BBA-9E6B-7801D91E6E5E/0/FFinalF003\\_StrategicContext.pdf](http://www.gov.je/NR/rdoonlyres/F3CD4ED8-340E-4BBA-9E6B-7801D91E6E5E/0/FFinalF003_StrategicContext.pdf)

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[http://www.gov.je/NR/rdoonlyres/561B06F8-8023-4665-8D79-E4F9783FD8F9/0/FFinalF014\\_Recommendations.pdf](http://www.gov.je/NR/rdoonlyres/561B06F8-8023-4665-8D79-E4F9783FD8F9/0/FFinalF014_Recommendations.pdf)

Extracts from the above conclusions in MWUD;

"....learn from other comparable places...."

“.. the future regeneration of St Helier must be driven by an effective partnership between the States Parish, business, investors, property owners and the community; unless this is achieved, the sub-optimal fixes and compromises that so many complain of are destined to be repeated.”

“Whilst something intelligent must happen on the waterfront, it cannot be a substitute for a proper urban renaissance in St Helier. To achieve this more people must start liking St Helier...”