



Chartered Architects, Planning and Design Consultants

Our Ref: PWH/1871

15th March 2012

Mr A. Coates
Senior Planning Officer
Planning & Environment Department
South Hill
St Helier
JE2 4US

Dear Alistair,

**Plémont Holiday Village – P/2011/1673
Response to TTS Transport Policy section consultation response dated 5th March 2012**

I refer to the e-mail dated 5th March 2012 from Mr David St George to you regarding the above application. We received a copy of this e-mail on 12th March 2012.

His comments clearly overlooks the fact my Client is entitled, without needing to obtain permission under the Planning Law, to refurbish the buildings and reactivate the tourism accommodation use. This refurbished existing accommodation could be used for holiday self-catering units under which the Tourism Registration Certificate (issued under the Tourism Law) allows for the existing accommodation to be let to 'non qualified' residents (akin to 'lodging' accommodation) outside the period of normal tourist demand (November to March), thereby increasing usage to year round occupation.

Further, if the owner or any prospective purchaser decided to submit an application to redevelop the site for a new tourism complex, they would have a reasonable expectation to receive permission for redeveloping the site for a similar floorspace area, subject to demonstration of visual improvement. In either case the end result would be retention of the existing buildings 'en-masse' and intensification of their use all year round, with a corresponding increase in car usage above that experienced when the Holiday Village was operating.

That would result in approximately double the amount of traffic compared to this application.

Your Department's Report published on 24th September 2010 concluded¹, regarding traffic considerations:-

"The Department will encourage strategies that help to reduce the need to travel and which develop alternatives to the private car. A traffic Impact Assessment has been submitted with the application and it is evident that the proposed redevelopment would result in a lower maximum occupancy than the existing holiday village, when last operational, and as such, trip generation should also be reduced."

¹ Confirmed in Department Report published 24th September 2010 for Planning Panel meeting on 7th October 2010

BDK Architects
White Lodge
Wellington Road
St Saviour
Jersey
Channel Islands, UK
JE2 7TE

Tel: (01534) 768740
Fax: (01534) 739115
E-mail:
Enquiry@BDKArchitects.com
www.BDKArchitects.com

Directors

Paul W. Harding
BA (HONS) DIP ARCH RIBA MIOB

Dee U. Harding
BA LAW
(NON-EXECUTIVE DIRECTOR)

Architects

Myles D. Winchester
BA (HONS) DIP ARCH RIBA

Anna C Powell
BA (HONS) DIP ARCH

Proprietors

Channel Architects Ltd.

And in connection with advice received from Highways Section of T&TS your Departments report advised that:-

"Development of the site by way of 28 dwellings will have a far lesser impact upon the local road network and junctions than the holiday village when operational. Whilst T&TS have some concerns regarding trip generation and lack of sustainable modes of transport, the Department is satisfied that the substantial gains to be had from the development of the derelict [sic] site outweigh any concerns regarding highways issues. The dwellings comply with the Departments recommended car-parking standards."

This proposal would clearly result in less traffic than was the case when the Holiday Village was operational, and would also involve about half the amount of traffic than would be incurred from the alternative option to refurbish the existing buildings and operating them as a combined self-catering and residential winter lettings.

The submitted Transport Assessment report² concluded that:-

"Trip generation from residential developments generally follow a pattern with the greatest traffic flows during the AM and PM peak hours, and it is anticipated that this development would generate 28 two-way movements during the morning peak and 22 two way movements during the evening peak. These traffic volumes are low and the proposed development should not have any significant adverse impact on the network.

There would also be a reduction in commercial vehicle movements due to less refuse collections, the absence of any food or drink deliveries and coach movements.

The existing development may also be refurbished back to its existing authorised use as a tourism holiday village at any time without the need for additional planning permission. The site may consist of up to 200 units if redeveloped. It is calculated that this development would result in 11 two-way movements during the AM peak and 37 two-way movements during the PM peak.

The new residential development is not expected to have a severe effect on the use of La Route de Plémont. The greatest amount of traffic is predicted to be 86 two-way movements (development and beach) between 1700 and 1800 during August. It is therefore predicted that the traffic flows with the new development will not vary significantly from the traffic flows previously recorded during peak periods.

Analysis shows that Portinfer Crossroads has sufficient capacity at present and that the proposed development has very little effect on the existing capacity. The accident information shows that over a five-year period from 2003 – 2008 there have been two minor accidents near the junction. It is recognised that many of the trips from the proposed development will be going to St. Helier for shopping, recreational and other purpose. There are numerous routes that can accommodate this journey, and the majority of them will avoid the congestion problems of Beaumont Junction. The traffic will disperse as it enters St. Helier and is therefore unlikely to add to congestion problems in the town.

Average trip lengths from the proposed development will be comparable with other residential developments within St Ouen. The existing bus service offers an alternative mode to the car for some day trips from the development to St. Helier.

² Parsons Brinckerhoff Ltd, Report Number HTC91380A/1 - Plémont Holiday Village Transport Assessment – 30 Houses, as Amended to 28 Houses

The proposed development will not cause a major increase in peak hour trips through the local network. Generated traffic volumes are low both during peak hours and throughout the day, meaning that the proposed development should not have any adverse impact on the network. There would also be a reduction in commercial vehicle movements.

It has been shown that the proposed development would not have an undesirable effect on any junctions within the local highway network. In addition, the passing places would enable vehicles to travel safely along La Route de Plémont.

Due to the various routes available between the proposed development and St. Helier, the impact of development traffic on such routes will be dissipated.

It is considered that the development is acceptable in terms of transport impact."

Further Mr St George's letter of 19th March 2002 advised your Department that the measured traffic volume from the Holiday Village when operating was 400 vehicles every 12 hours and he would expect about 40 to 45 dwellings to generate a similar traffic level. This application for only 28 houses clearly will therefore result in a 37% reduction in the amount of traffic compared to the alternative of continuing the existing authorised use, without taking into account the significant increase in car usage that would result from winter lettings.

It should further be noted that Plémont Bay Holiday Village is reasonably accessible to several cycle routes, including routes 1, 3 & 4 identified on the Jersey Cycling Guide Map.

Policy TT8 - Access to Public Transport

Plémont Bay Holiday Village is located very close to a bus route (all proposed houses are within 200 metres of an existing bus stop) and are reasonably accessible to a cycle route. Proximity to this bus stop is half the maximum distance required by Policy TT8.

This bus stop, immediately outside Plémont Bay Holiday Village, enjoyed a regular bus service throughout the whole year until fairly recently. The bus stop still enjoys a regular Summer Service timetable and during winter months the bus still serves nearby Portinfer hamlet. There is every likelihood the bus operator would reinstate a regular winter service to this bus stop immediately outside Plémont Bay Holiday Village following completion and occupation of the houses.

Conclusion

It is therefore apparent this application complies with 2011 Island Plan Policies SP6 & TT8 and, in particular, will substantially reduce car usage and is well related to the primary roads and cycle networks.

Best Regards,
For and on Behalf of
BDK Architects


Paul W. Harding BA DipArch RIBA
Director

cc. Deputy Rob Duhamel – Environment Minister
Mr M. Grindrod – Northern Trust Group Ltd