



PLANNING & ENVIRONMENT DEPARTMENT

Draft Island Plan – White Paper
Travel & Transport
Minister's Response to consultation
27th May 2010

Ref	Agent	Name	Org/bus.	No.	Title	Response	Suggested changes to the document:	Why you consider this to be necessary:	General Response	Detailed Officer Response	Minister's Recommendation
Travel & Transport											
DP1058		Ray Shead	The Jersey Chamber of Commerce	8	Travel and Transport	Objecting	A strategic debate on assessing the need, desirability, impact and function of Transport car use in Jersey has not been concluded. The arguments against car usage have been over simplified. The south of town is regarded as the location for growth in retailing floor space in the draft IP and in recent years this area has enjoyed the lion's share of investment in transport infrastructure. The north of town is being groomed for more housing, as indicated in the North Town Master Plan's (NTMP) Terms of Reference, which deliberately ignores retailing to the detriment of many small independents that have a valuable role. The socio-economic impact of proposed closure of roads must be properly described. It is difficult to understand the adequacy of evidence feeding into the Sustainable Transport Policy review (STP) because it appears that a strategic decision to ignore reasonable access to the wider general public has already been taken, based on narrow environmental and welfare arguments. This should be independently reviewed. Chamber has repeatedly alerted the strategic risk of a "tumble weed" St Helier, which remains unacknowledged by the States' strategic planning. The majority of trips made to town by those using shopper parking facilities say that it is difficult to find a space (JASS 2008 figure 5.4). Given that the south of town is regarded as well served for transport access, this reflects badly upon and disadvantages shopping in the north of town. 8.1 - 8.14 - The STP and IP should make proposals that are appropriate and realistic for an Island-wide holistic transport strategy. Reducing car usage can only occur when practical alternatives have been provided. The harbour's location and existing road structure make urban St Helier/St Saviour the primary location for logistically efficient food and non-food retailing.		Reject	The States Strategic Plan seeks to shift attitudes towards the ownership and use of the private car and, on this basis, the strategic objectives of seeking to reduce private car use and to develop a more sustainable pattern of transport in Jersey is considered to be clear; The North of Town Masterplan seeks to address matters of car parking infrastructure as an integral element of the masterplan. The completion of the St Helier Ring Road in this area in recent year's represents significant investment in transport infrastructure in this part of the town; Road closures: there are no proposed road closures in the draft Plan. Proposal 18 sets out proposals for pedestrian priority in parts of the town. The maintenance and enhancement of the viability and vitality of the town centre is an objective which underpins these proposals as demonstrated by the success of other pedestrian priority schemes already implemented in St Helier (e.g. Charing Cross and Broad Street); Ease of public parking: the draft Plan seeks to ensure that the level of off-street public parking provision in the town is maintained. Whilst JASS suggests that some people may find it difficult to park, it does not determine in which part of town they had difficulties or whether they were unable to park and it clearly indicates that the difficulty of finding a parking space is higher for those on-street 20 minutes. In this context, it is relevant to note that shopper car park capacity is generally available at Sand Street MSCP.	The Minister is not minded to amend the draft Plan
DP620		Ms Sarah		8	Travel and	Neither	1. Introduction This review focuses on the		Reject	Electric car use: this is a land use	The Minister is

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		Le Claire			Transport		<p>sections relating to the reduction of the Island's dependence on the car (Section 2.6) and Transport (Section 8). The White Paper makes a number of strong macro statements: 'Changes in climate are likely to have far-reaching, and potentially adverse, effects on our environment, economy and society for which we need to prepare and adjust. There is, therefore, an urgent need for action on climate change.' (Section 2.9, p35) 'The main focus of this policy is to create the conditions necessary to minimise the worst aspects of car travel, to provide alternatives to the private car and to improve air quality.' (Section 2.61, p48) 'In this respect, it can seek to promote and apply policies which have a direct impact on reducing travel demand, enabling and encouraging travel by more sustainable modes and assisting the objectives of traffic management by influencing matters such as levels of car parking availability and infrastructure to support other travel modes and fuels (eg the provision of cycle paths, cycle parking and electric charging facilities).' (Section 8.2, p298) Whilst the statements above are commendable there is a woeful lack of detail on the use of electric vehicles (EVs) on the Island and indeed the only reference in the entire paper to any form of EV is in a reference to electric charging facilities in section 8.2. 2. SECTION 2.6: REDUCING DEPENDENCE ON THE CAR The thrust of this section is to ensure that new developments comply with a "Travel Plan" that deals with issues such as accessibility, parking and traffic control etc. It seems a pity that a section entitled 'Reducing the Dependence on the Car' does not go further and explore what alternatives there are to vehicles that are reliant on fossil fuels. AGES would like to see, under this heading, a section focussing on the alternatives to the combustion engine, for example: EV's, Hydrogen fuel cell cars and compressed air cars. 3. SECTION 8: TRAVEL AND TRANSPORTATION The objectives and indicators for travel and transportation are as follows: Objective TT 1: Travel and Transport Objectives to reduce the need to travel through the integration of planning and travel and transport strategies which serve to minimise travel and traffic generation; to influence travel demand and choices of travel mode by achieving development forms and patterns which enable and encourage a range of alternatives and which positively enables and promotes walking, cycling and public transport as</p>			<p>planning policy document and as such, can only seek to affect those aspects of promoting electric car use that relate to the use of land and buildings, hence the reference to such at 8.2; Efficiency of Island bus service: this is a land use planning policy document and is not related to the management or specification of the contract to run the Island's bus service, which is managed by the Transport and Technical Services Department</p>	<p>not minded to amend the draft Plan</p>

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							<p>a more sustainable mode of travel than the private car; to make efficient use of existing transport infrastructure and minimise new road construction; to reduce pollution, noise and the physical impact and risk to health posed by traffic and transport Indicators TT 1: Travel and Transport Indicators level of peak hour traffic flow by mode level of road injuries level of road transport pollution number of travel plans implemented AGES proposes that the following objective is added: 'to facilitate the use of EVs on the island with the aim of achieving a target of 10% of all new vehicles registered by 2014 will be an Electric Vehicle' Following on from this a key indicator would be: 'number of electric vehicles registered in 2014'. The Island Plan White Paper looks at each of the objectives in detail. The detail required for the new objective proposed above could be taken from Section 4 of the Report to Chief Minister of 1 st December 2009 entitled 'Transportation Jersey - Replacing the Combustion Engine' (as discussed on 9 th December 2009), which highlighted some of the incentives and or penalties that may be used to encourage the use of EVs in Jersey. The Island Plan White Paper then goes on to discuss how, when making transport related decisions, priority must be given to the most sustainable modes of travel (section 8.22). AGES would have hoped to have seen EVs mentioned as a higher priority than car borne shoppers and visitors (priority 7) and car borne commuters (priority 8). Finally, section 8.65 looks at Public Transport and again the emphasis seems to be on public transport in the context of planning and development and not on ensuring that the bus service is run in the most efficient manner, the ultimate manifestation being an electric bus service. It would not be difficult to include a paragraph that set out the guidelines for all future tenders for the supply of bus services, which would include a set of criteria on the carbon efficiency of the buses as well as an option to provide an electric bus service. 4. CONCLUSION It is appreciated that the Island Plan White Paper is a macro level plan and certainly identifies many of the environmental problems facing the Island in the short to medium term. However, AGES is surprised that there is no mention of the EV as part of the solution to the climate change challenge, especially as the States are in a position to take the lead in encouraging the use of EVs (both private vehicles and public transport) for</p>				

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							very little or even no capital outlay. It is hoped that, at the very least, the suggestions mentioned above are considered and included within the final Island Plan. It is also appreciated that it may be more appropriate for some of these observations and recommendations to be included within the Sustainable Transport Plan rather than the Island Plan. As such, this paper will also be forwarded to Transport and Technical Services for their consideration.				
DP635		Richard Plaster	Jersey Electricity plc	8	Travel and Transport	Supporting		We support strongly some of the objectives in Section 8 - Travel and Transportation, as we believe that electric vehicles and electric buses have the potential to meet many of these objectives. We would recommend that these opportunities be explicitly mentioned in the Plan with an indication of the States' commitment to these.	Noted	Electric car and bus use: this is a land use planning policy document and as such, can only seek to affect those aspects of promoting electric car use that relate to the use of land and buildings, hence the reference to such at 8.2;	The Minister notes the support for the use of electric vehicles
DP660		Conneta ble Peter Hanning	Parish of St Saviour	8	Travel and Transport	Objecting	I write to submit the Parish viewpoint on certain aspects of the Draft Island Plan which I consider are very relevant in respect of St. Saviour. In so doing I make no apologies for expressing criticism at the lack of judgement and foresight on certain aspects that emanated as a consequence of both the 1987 and 2002 Island Plans. Traffic One must question the logic of permitting nearly 2/3 (19) of all island primary and secondary schools to be established within a radius of 3 miles in and around this Parish. The consequential effect of school orientated traffic brings about virtual gridlock on the main arterial roadways to town. That, and the lack of on-site parking at certain schools has led to serious issues of indiscriminate parking and public disquiet, particularly from neighbouring residential areas. A prime example being Wellington Road which situation can best be described as chaotic. It is also very noticeable that 'white van man' syndrome is manifesting itself in the lower reaches of the Parish, where the urban sprawl and commercial activity is seemingly forever creeping. It is therefore becoming increasingly important to regulate more stringently the requirement for business houses to demonstrate that their commercial vehicles are properly catered for on-site, without reliance on kerbside parking or within residential estates. Likewise provision for accommodating visitor/customer traffic should be a pre-requisite.		Noted	School traffic management: the generation of and management of traffic associated with the Island's schools is not a land use planning issue. Notwithstanding, the draft Plan seeks to encourage and facilitate the use of other modes of transport other than the private car to reduce congestion on the Island's roads, particularly during peak hour travel; Commercial parking: the draft Plan makes it clear that the Minister will review parking guidelines (Proposal 19). It is also relevant to note that there may be proposals emerging from the Sustainable Transport Policy, being developed by the T&TS Dept, which seek to regulate commercial vehicle use part of which may consider the level and type of parking provision for such vehicles.	The Minister is not minded to amend the draft Plan
DP750		Paul Harding	The Association of Jersey	8	Travel and Transport	Objecting	12.1 There are inherent contradictions between Built-Up Area section in the 2009 Draft Plan compared to the Travel & Transport section. For example a significant section of the Built-Up area		Reject	Reduce the need to travel: the assertion is made that the draft Plan fails to reduce the need to travel by seeking to constrain	The Minister is not minded to amend the draft Plan

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			Architects				is located with the western 'housing conurbation' of St Brelade and St Peter and the Plan militates against employment uses in this area forcing these residents to primarily work in St Helier, but the overarching Travel and Transport objective is reducing need to travel. In which case the Plan should surely promote some employment related uses (offices, retail, etc.) within the western part of the Built-Up area, rather than concentrating them in St Helier ? 12.2 The AJA does not believe that issue of public transport provision should be conflated with the best and most appropriate solutions for locating our built development requirements.			development out with St Helier thus necessitating the need for people to travel to town to work. It is accepted that the Spatial Strategy seeks to focus on the town of St Helier and, from a transport perspective, this is considered to be appropriate, because of the concentration of people in and around the town, and the fact that the transport infrastructure is centred on St Helier. It is relevant to note, however, that the draft Plan does permit employment activity outside of the town of St Helier, in other parts of the Built-up Area, as facilitated by policies EO3: small scale offices; ER3 Local Shopping Centres (in which Les Quennevais/Red Houses and St Peter's Village are defined); EVE2 Tourist Development Areas (including St Aubin and St Brelade's Bay); and Proposal 12: Jersey Airport Regeneration Zone, which specifically refers to the potential for new commercial activity here. It is thus not accepted that the draft Plan precludes employment activity in the western Built-up Areas. Public transport provision: The objective of Policy TT8 is not to constrain new development (where it accords with the Spatial Strategy of the Plan), where it is not within 400m of the existing public transport route network, but rather to ensure that the public transport route network is developed and enhanced to ensure that those locations most appropriate for development receive a better level of public transport provision than that which they might currently receive.	
DP970		Mr. Maurice DUBRAS		8	Travel and Transport	Neither	For background, I am working with the Draft 2010 consultation document and the computer map. Also, I have in hand the 2001 Consultation document which was the basis for the 2002 Island		Noted	The draft Island Plan has sought to respond to, support and complement the emergent Sustainable transport Policy, as	The Minister notes the comments made and will seek to

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							<p>Plan which is in effect, together with the maps that accompanied it. I note that the Transport & Technical Minister issued a draft Sustainable Transport Policy whose consultation period ended at the end of November. I believe it is remiss of that Minister not to make a cross-reference in his document to the Draft Island Plan Review and accept, in effect, that it needs to link in with it and your process. Fortunately, on page 298 of the later document, the Environment and Planning Minister makes reference to the planned Transport consultation which by now has no doubt been completed. I make this point for, as Deputy for St. Lawrence between 1996 and 2005, I made it my duty to the parishioners to work hard to try to relate the two departments [or their predecessors] and Committees [now Ministers] and their work to one another insofar as it influenced community life within the Parish and for those travelling through it. As a case in point, the large housing development at Bel Royal which was very problematic for many of the residents in the surrounding neighbourhood, was one where I made every effort to ensure that the likely impact of that development on travel and transport and the roads, pedestrian and cycle pathways together with the bus network were properly integrated. I am not convinced to this day that that aspect of the recent Transport policy and action plans yet has been properly integrated with this Draft Island Plan and I look to the next stage of this Review and consultation process to prove to me, and convince me, otherwise. Therefore, I urge the Minister to require due process to take place and every effort be made in consideration of each of the proposals under proposed new Policy H1 and H2, as successors of the 2002 H1 and H2 policies, to ensure that the Sustainable Transport policy is taken fully into account. Conclusion At this point, I return to my earlier comments about connecting transport policy for roads and related services, as well as those for economic development, with those for planning to the continuing need for a holistic approach to be taken. For those of us living at the nexus of roads from the west and north the pressures and disturbance of traffic is very high. For those of us of all ages who are pedestrians, the risk to our safety is considerable. When any one of the roads is closed for any reason or special events take place to the west and north of us, we generally suffer severe inconvenience. In spite of warnings</p>			<p>stated at 8.3. The transport implications of new housing sites have been considered as an integral element of site assessments.</p>	<p>work with the Minister for Transport and Technical Services to ensure consistency of objective and application of policy, where it relates to travel and transport</p>

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							for the last ten to fifteen years or more, nothing appears to have been done to redesign or improve the road network to the west to minimize the congestion. While many of us utilize the bus system, the increasing population by way of new developments out of St. Helier has not been correspondingly accommodated by alternate modes of transport. I urge you and the other Ministers to pay special attention to these dilemmas in the immediate future, for the long term benefit of existing residents. My request for a special study, on both macro and micro levels, made in 2004 and 2005 is thus maintained and reiterated. Other changes in existing policies or the introduction of new policies elsewhere in the Draft Island Plan that have a potential effect on us and our neighbours need to be carefully thought through, especially seeking out unintended consequences. No part of the community is an island within this Bailiwick; every part, however, is special in its own right. That is why this revised Draft Plan is important and why this consultative process and Review by external inspectors is welcomed.				
DP983		Conneta ble K Vibert	Comite des Conneta bles	8	Travel and Transport	Neither	Agricultural accesses The Director of Planning advised that the creation or widening of accesses to public roads which are predominantly for agricultural purposes does not require planning permission as they are permitted by Schedule I, Part 2, Class F of the Planning and Building (General Development) (Jersey) Order 2008. However, we note that such permitted development is subject to condition F.3 namely: "The approval of the relevant highway authority must have been obtained before the means of access is made or widened. ". Is it not therefore possible for the 'relevant highway authority' to impose conditions to prevent the loss of gateposts and damage to such features as roadside walls when granting approval? I am sure all Parish Roads Committees would be prepared to impose such a condition and would hope the Minister for Transport and Technical Services would agree to do likewise for main roads. This would 'protect and enhance our natural and built environment' which is Priority 13 in the States Strategic Plan 2009-2014. Of course, any amendment you may wish to make to the Order to strengthen this requirement would be most welcome but can it not be applied immediately?		Noted	The issue raised is not one for the draft Plan but for planning legislation. In this respect, it is relevant to note that work to amend the Planning and Building (General Development)(Jersey) Order, to address the concerns raised, is ongoing.	The Minister notes the comments made but is not minded to amend the draft Plan
DP986		Conneta ble K	Comite des	8	Travel and Transport	Neither	Planning gains The principle of 'planning gain' has recently been introduced by your Department; we		Reject	The upholding or enforcement of planning conditions is not	The Minister is not minded to

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		Vibert	Conneta bles				understand that this relates to highway improvements which might be made when larger developments take place but is a matter for negotiation with the developers as it cannot be made a condition of granting the application. The key theme to all these seems to be the inability to impose or enforce conditions as part of the granting of a planning consent. We recommend that if, as your correspondence suggests, you cannot endorse conditions imposed by a highway authority this must be addressed as part of the Island Plan review.			material to the Island Plan Review. The use of Planning Obligation Agreements, which are mutually binding legal contracts at Policy GD4: Planning Obligation Agreements	amend the draft Plan as the issues raised are not material to it or are already addressed
DP586		Deputy John Le Fondre			TT: Introducti on	Supporting	Ref para 8:14 Parking Provision - limited support to reduce the amount of car parking associated with new residential development. - AGREED ! See comment before. However this does need to be taken on board as part of the planning process. Developments (even in town) should not be permitted minimal parking provision.		Note qualified support, but reject qualification	The ability to park is fundamental to the use of the private car thus the planning process can influence the availability of parking at the start and end of each journey. As a consequence, Proposal 19 of the Plan proposes the adoption of new maximum parking guidelines, as opposed to minimum parking guidelines.	The Minister notes the qualified support, but is not minded to amend the draft Plan
DP9		Mr Mark Le Sueur			TT: Objectives and Indicators	Objecting	Assumption : The States assume that there will be a continuing need for road traffic transport. Observation : The plan appears to dodge or evade the core principles of process management (traffic management), the elimination of constraints within the current traffic flow. This is not a onetime fix but an evolving strategy of continuous quality improvement for the moderation (easing) of traffic flows. Clearly there is a need to identify the current constraints and plan for their moderation of the constraints . Plan as written has no clear objective of plan to achieve that objective; a non plan . The performance indicators as written are meaningless other than for the continued measurement of past failures. This section of the plan requires a radical overhaul by somebody who understands of process management (traffic management).		Reject	The travel and transport objectives of the draft Island Plan are considered to be clear and consistent with those of the emerging Sustainable Transport Policy, sponsored by the Island's strategic highway authority, the Transport and Technical Services Department. Furthermore, there is a need to recognise, as stated in the document, that the Island Plan is but one element of a comprehensive policy regime relating to travel and transport, and specifically the land use elements of it, and thus its aims, objectives and outcomes can only ever influence part of the wider issue.	The Minister is not minded to amend the draft plan
DP177		Mr Stephen de Gruchy		Objectiv e TT 1	Travel and Transport Objectives	Supporting			Noted	Noted	Support is noted by the Minister
DP417		Mr Marc Burton	Institute of Directors	Objectiv e TT 1	Travel and Transport Objectives	Supporting	The IoD supports the reduction in car traffic into town but would like to see a joined up and cohesive policy on how this can be achieved whilst ensuring businesses do not suffer e.g. with lack of parking provision for staff and employees or alternative means of transport. Issues are under consideration via the North Town Masterplan in		Noted	The Draft Island Plan is a land use planning policy document which, as stated at section 8.2 and 8.3 of the Travel and Transport chapter (p.298), seeks to ensure consistency and complementarity with other policy regimes	The Minister notes the qualified support for these objectives and will seek to ensure that the

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							terms of parking at Gas Place, Anne Court, Green Steet and Minden Place, but again this must be within the guidelines of the Island Plan, the general vision for St. Helier, and have a co-ordinated approach;			affecting travel and transport in the Island. In particular, it is important that the Island Plan is consistent with the emerging Sustainable Transport Policy from the T&TS Department, which is the Island's strategic highway authority.	Island Plan is consistent with and complementary to other policy objectives related to travel and transport
DP1059		Ray Shead	The Jersey Chamber of Commerce	Indicator s TT 1	Travel and Transport Indicators	Objecting	8.15 - 8.23 & Indicators TT 1 - Shoppers' access and travel needs are not appraised. A policy to favour "only bulk shopping in out of centre locations" (8.20) is unclear whether this is designed to relocate shopping activity in the Markets away from St Helier to new food shopping locations yet to be identified. Clarification is requested.		Reject	Access and travel needs, where they relate to food retailing, are considered within the policies ER1 - ER11 where there is a clear strategic approach set out which seeks to ensure that the vitality and viability of existing retail centres is maintained and enhanced, particularly that of the centre of St Helier.	The Minister is not minded to amend the draft Plan
DP1173		Mrs. Celia Scott Warren			TT: Policies and Proposals	Supporting	I welcome the Travel and Transport initiatives. However, I believe there must be adequate car parking provision in St. Helier - otherwise St. Helier town centre and the shops will suffer.	Whilst I support park and ride schemes, car-sharing initiatives and increased bus usage, there needs to be adequate car-parking provision in St. Helier, for the reasons given above.	Noted	The proposed policy regime in relation to car parking is considered to be sufficiently robust to ensure the provision of adequate car parking provision for shoppers in order to maintain the vitality and viability of the town	The Minister notes the qualified support for this part of the draft Plan
DP1119		Mr Ben Ludlam	C Le Masurier Ltd		Targets	Objecting		The Transport proposals and Draft Integrated Travel and Transport Plan are totally unrealistic and unworkable, particularly the proposed 50 % increase in bus and cycle use. The whole transport issue, including the use of the car and the cost of car parking, which is extremely low, in States of Jersey public car parks needs to be reconsidered. The Island Plan cannot be provided in its current form without this review. The comments above can be used in the consultation but should not be printed, in any form, with our prior written consent.	Reject	The issues raised essentially relate to the emerging Sustainable Transport Policy, sponsored by the Transport and Technical Services Department, and not the draft Island Plan. The Island Plan is a land use planning policy which will seek to support other strategic policy objectives related to travel and transport as established by the strategic highway authority.	The Minister is not minded to amend the draft Plan
DP665		Deputy James Reed	Education, Sport and Culture		Walking and Cycling	Supporting		The Ministerial Team supports the work of the Transport and Technical Services Department in developing the Island's cycle network, and believes this should have a positive impact on the Island's transport system, particularly at peak times. The ESC Department works with Transport and Technical Services on a variety of relevant initiatives, including the Safer Routes to School project, and we encourage students to consider transport alternatives in travelling to and from school. It is recommended, therefore, that due prominence should be given in the Island Plan to the promotion of alternative transport solutions, as this would be in line with policies already being	Noted	Noted	Support is noted by the Minister

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								promoted by the Transport & Technical Services and Education, Sport & Culture Departments.			
DP874		Mr Stephen D Smith	Health Protection Services		Walking and Cycling	Neither	In all new developments there needs to be provision of pedestrian, cycle ways and access to bus stop(s). The provision of such could assist in island wide transport networks i.e. eastern railway walk etc.		Noted	This is already explicitly addressed as part of Policy TT8: Access to public transport	The Minister is not minded to amend the draft Plan as the issue is already addressed
DP882		Mr Andrew Heaven	Health Improvement (Public Health Department)		Walking and Cycling	Neither	In order to ensure health improvement is actively included within the planning process, supplementary planning guidance for health improvement should be developed with the Public Health Department to support the following areas: Ensure travel planning promotes cycling and walking as part of any future development that could lead to increased travel demand or would have a significant impact on travel or public transport systems Ensure new developments to both natural and built environments have explicit obligations to secure safe pedestrian access to pavements, cycle routes or public transport. e.g. Public Realm of St Helier		Noted	Travel Planning is addressed by Policy TT9. It is acknowledged that there is likely to be a requirement for guidance about the development and monitoring of travel plans which can be done in consultation with key stakeholders, including T&TS and the Public Health Dept; The requirement for new development to be well related to existing transport infrastructure (including public transport and cycle routes and footpaths), as well as contributing towards the enhancement of the transport infrastructure, is set out in Policies TT2; TT3 and TT8	The Minister is not minded to amend the draft Plan as the issues raised are already addressed
DP19		Mr Terence Tanner			Footpath and Cycle Network	Neither	If cycle path provided cyclists should not use public road	the reason for spending money providing bike riders with these paths is to ensure their safety but a minority still use main roads which cause backlogs of traffic and drivers become impatient and make reckless decisions.	Reject	This is not a land use planning matter, however, cyclists are legitimate road users of the public road network and if the Island is to secure a more sustainable pattern of transport in the Island, there is need to encourage more cycling on all elements of the public road network, including existing and new cycle tracks as well as the existing road network. It is an unrealistic assumption to suggest that more cycling should be encouraged whilst seeking to limit cyclists to the use of cycle tracks where they are provided adjacent to roads. One of the specific objectives of cycle tracks is to provide facilities to encourage more cycling by more vulnerable sectors of the population, such as children and adults who perhaps are lacking in confidence to use the road: they are not provided as an alternative	The Minister is not minded to amend the draft Plan.

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										to the road for all cyclists. Furthermore, cycle tracks are only generally designed for lower speeds of travel and some cyclists may wish to travel faster for which it is more appropriate, and safer, to use the public roads. What is required is an increased awareness and tolerance of the rights and responsibilities of all road users, all of whom have a legitimate right to use the road network in whatever mode of transport they choose.	
DP178		Mr Stephen de Gruchy		Policy TT 1	Protection of the Island's Footpath and Cycle Network	Supporting			Noted	Noted	Support is noted by the Minister
DP984		Conneta ble K Vibert	Comite des Conneta bles	Policy TT 1	Protection of the Island's Footpath and Cycle Network	Supporting	Accesses across pavements Several Parish Roads Committees, when considering requests to widen or create new vehicular accesses across pavements, currently ask the applicant to lower kerbstones and realign the pavement. The advice from the Assistant Director - Development Control is that the Planning Department cannot impose conditions and other restrictions relating to land which is not in the applicant's ownership. We understand that the Planning Department may not be able to impose such conditions but would suggest that, if a highway authority has to grant permission prior to an entrance being widened then that highway authority can determine the terms and conditions which might be imposed on such a permit. We would therefore suggest that where the pavement is owned by another (usually the States or Parish) that owner should be able to require the applicant to make such changes as a condition of granting the access. This would also 'protect and enhance our natural and built environment'.		Qualified support noted	The support of the Comite des Connetables for this policy is noted. Where development affects, or places a burden on community infrastructure, however, consideration should be given to the use of planning obligations, as set out in Policy GD4, to ensure that community infrastructure can be properly planned and/or to ensure that the true cost of development is met by the developer.	The Minister notes the qualified support for this policy
DP587		Deputy John Le Fondre			Footpath Provision and Enhancement	Supporting	Ref para 8:37 Protection of banques, walls etc - I completely agree with this statement. However there have been occasions when such features have either been completely removed, or when reinstated have been brash new constructions which have not been sympathetic with what has been replaced. By way of example, it is my understanding that a banque can consist of a (granite) wall (often being a mix of granite and other stone, rather than a perfectly dressed brand		Noted	The need to ensure that the implementation of this policy recognises and protects the character of the countryside is acknowledged. It is considered that the policy is sufficiently robust to deal with this issue as specific reference is made to Proposals 4; Policy NE4; Policy HE3; Policy HE4 and Policy HE1,	The Minister notes the qualified support for policy TT2

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							new granite wall), with an earth bank on top of it. [As well a being a normal bank]. Which then gets covered in grass, trees and other vegetation. There have been occasions when this has just been replaced with a standard granite wall, with a couple of tress planted behind it. That is just urbanisation, and does not signify the careful design led criteria that one is usually promised at the start of the process. There therefore needs to be attention to this type of detail in order to ensure that the character of the area is not just completely destroyed by the development process.			which seeks to protect natural features as well as features of architectural and historic interest.	
DP179		Mr Stephen de Gruchy		Policy TT 2	Footpath Provision and Enhancement	Supporting			Noted	Noted	Support is noted by the Minister
DP752		Paul Harding	The Association of Jersey Architects	Policy TT 2	Footpath Provision and Enhancement	Supporting	12.5 While the AJA generally supports this Policy we believe it should recognise there are good alternatives to siting new footpath infrastructure next to roads. There are instances where there are more amenable solutions to siting footpaths immediately adjacent to roads - e.g. new Airport footpaths.		Note qualified support	The policy does not specifically require the provision of new footpaths immediately adjacent to the road and thus enables the consideration of alternative routes. The need for direct, convenient and safe pedestrian access needs, however, to be recognised.	The Minister notes the qualified support for this policy and considers that the policy, as drafted, addresses the qualification made. The Minister is thus, not minded to amend the draft Plan.
DP1060		Ray Shead	The Jersey Chamber of Commerce		Pedestrian Priority	Neither	38 - Pedestrianisation and other investment bring benefits to the public realm. However there are also disadvantages which the IP fails to discuss objectively. Supporting the town centre's "vitality" and "viability" by further pedestrianisation are economic assumptions, presumably made as an aesthetic appraisal, without reasonable regard for any possible negative impact. The community should be presented with a balanced discussion on whether the IP is adopted in this form, as is best practise and a legal requirement in the UK (PPS4). 8.41 - Closing these streets will be viewed by some as a significant increment in effectively pedestrianising St Helier. This is not a certain economic gain; there are benefits and costs. Services will be lost and traffic nuisance will be condensed elsewhere. If valued services are to be maintained, the IP and STP must improve St Helier's accessibility or reassign retailing elsewhere on and off the Island. EDAW is being cherry picked of anti-car policies, when other		Reject	Pedestrianisation: the draft Plan contains no proposals for pedestrianisation. Proposal 18 puts forward proposals for the potential introduction of pedestrian priority, following further development, analysis and consultation. One of the objectives of the development and implementation of these schemes is to safeguard and promote the commercial viability of these areas, as has been achieved by the implementation of existing schemes such as those undertaken at Broad Street, Charing Cross/York Street and Conway Street; Consultation; the Island Plan will not be adopted until there have been opportunities for the policies and	The Minister is not minded to amend the draft Plan

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							<p>proposals made by EDAW to facilitate economic activity are ignored. 8.42 - Modelling must be seen to be done objectively and transparently. The terms of reference and methodology for such work should be published before it commences, if it is to be credible. 8.43 - Traditional trading in the Markets is under direct threat by this proposal. The potential cost to the community has not been explored in the IP. The Markets require more than servicing access. Food shoppers need parking a lot closer than the 300-500m distance that planners have been using as a guideline. The States of Jersey have a statutory duty of care to manage the Markets for the benefit of the public. 8.44 - Detailed discussion with the freight service providers must be considered before Waterloo Street becomes the only HGV route for this section of town. 8.46 - Dumaresq Street is a critical access point to trading in this area. Pedestrian safety issues should be demonstrated and alternative solutions discussed before businesses are threatened. 8.49 - These proposals need detailed explanation because they appear to be a significant step towards eliminating the car from St Helier despite a claim to the contrary. This should be rejected until a comprehensive transport and business plan are produced for St Helier. It is perfectly reasonable for Planning to create a vision of a car-less society because there are legitimate advantages to this. However there are also a myriad of disadvantages which must be objectively presented to enable the public to make an informed choice. The issues include important social and environmental concerns as well as the Island's economic welfare.</p>			<p>proposals contained therein to be publicly considered, debated and subjected to independent scrutiny, as evidenced by the consultation process on the draft Plan. This is a requirement of the Planning and Building (Jersey) Law 2002; Halkett Place: any pedestrian priority scheme for Halkett Place would need to be developed and considered having specific regard to the potential impact upon the viability of the current operation of the Central Market. The draft Plan acknowledges that the implications of any changes to traffic management in Waterloo Street would need to be identified, considered and assessed; Dumaresq Street: the limited width of the pavements in Dumaresq Street, whereby there is only just enough width to accommodate a single person and probably insufficient space to push a pram or wheelchair, present the challenge to pedestrian safety whereby vehicles and people are in very close proximity to one another, and where pedestrians may have to step into the road to pass each other. There are no specific proposals presented in the draft Plan, other than identifying the potential for this street to be the subject of further work to examine how pedestrian safety might be improved. The implications of any proposals for business would be the subject of detailed consideration, with local business and Chamber, as part of the development of any specific proposals. 8.49: the proposals set out here are drawn from the EDAW study, where they are set out. The proposals are also shown on the Proposals Map</p>	
DP588		Deputy John Le			Pedestrian Priority	Neither	Ref para 8:45 onwards Pedestrian Areas - there are a number of proposals to pedestrianise		Noted	Pedestrianisation: the draft Plan contains no proposals for	The Minister is not minded to

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		Fondre					various parts of St Helier. Whilst these may seem laudable (particularly if they are of the quality of Broad Street / Charing Cross) it does serve to emphasise the need to ensure that we do retain significant parking provision in the Gas Place / Minden localities, in order to ensure adequate footfall in that part of St Helier.			pedestrianisation. Proposal 18 puts forward proposals for the potential introduction of pedestrian priority, following further development, analysis and consultation; Policy TT10, and the supporting justification related to the North of Town, makes it clear that the existing off-street public parking provision in Gas Place (390 spaces) and Minden Place (240 spaces) should be replaced, should these sites be redeveloped.	amend the draft Plan
DP180		Mr Stephen de Gruchy		Proposal 18	Pedestrian Priority	Supporting			Noted	Noted	Support is noted by the Minister
DP423		David Dodge	Vienna Bakery	Proposal 18	Pedestrian Priority	Objecting	I specifically object to the proposal to close Halkett Place (8.43) draft Island Plan (IP) and the strategic thinking behind this proposal because I believe it will seriously threaten the future ability of the Markets to operate in an effective manner to the detriment of the public. See attached letter	The aim of the proposed road closure is to reduce the impact on pedestrians by cross-town traffic. However, it risks driving heavy bag food shoppers away from the St Helier Markets if adequate, safe and convenient alternatives are not provided. St Helier must be accessible if it is going to be able to compete and adapt. The current parking provision for the north of town is insufficient. The draft IP and awaited Sustainable Transport Policy (STP) have used a benchmark of the existing car park provision as a target, when this is inadequate. The IP and STP appear to confuse essential food shopper traffic with commuters who may be better able and prepared to walk 300 to 500 metres from the bus stop or edge of town transport hub to their destination. It appears the consumer choice to buy fresh food on a regular basis throughout the week in St Helier in a Continental lifestyle is becoming an anti-social behaviour. There may be untried or ignored potential opportunities for the provision of parking that would interrupt the gyratory hunt for a parking space, before shoppers cars come to the core of town. The focus for car park provision appears to be confined to the Public land when private developers may have appropriate opportunities. There is reluctance in government to lose "control" of car park service provision. The Markets are still relevant to modern Jersey life. The Markets are protected buildings still fulfilling their original design function. They are incorporated in Jersey Law and the States of Jersey have a duty to manage them on behalf of the public. Market activities help give St Helier	Reject objection but note comment	Neither Proposal 18 or the supporting justification for it @ 8.43, where it relates to Halkett Place, contains any proposal to close the road. The supporting justification, at 8.43, specifically acknowledges the need for any pedestrian priority scheme to ensure that the character and vitality of the Central Market is retained and that provision is made for appropriate servicing arrangements.	The Minister notes the comments made but is not minded to amend the draft Plan

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								<p>character and draw footfall. They are held in great affection by the local community and tourists. They have recently received valuable maintenance. They represent the iconic home for the best in Jersey produce and provide consumer choice in price, quality, freshness and service. Small Jersey food producers (in which category I include farmers, fisherman as well as food handling trades) need the Markets. Jersey would not have the variety and quality of food production that it enjoys if it were not for the support local supermarkets give the food trades. However, with the best possible will, it can be impractical for the local supermarket buyers to support very small food processors. The Markets are ideal targets for small start up ideas and innovation. Could one imagine the outcome in today's climate, of attempting to "sell" the Jersey Royal potato as a new product to a supermarket buyer with the description of "genetic fluke with a relatively short shelf-life and a super premium price"? Jersey food producers pay local tax, provide provenance for their food, and are committed and accountable to their customers. The Markets provide an ideal opportunity for small and start-up businesses. Jersey cooks and restaurants need the Markets. The Markets provide a face-to-face contact for the consumer and food trade experts to exchange views. How should a food be kept, what are the best ways of preparation cooking, where does it come from, what are the seasonal variations and are there different varieties? This offers a knowledge bank for the consumer and invaluable marketing feedback for the trader. Food matters greatly to a large proportion of the Jersey public. Our difference to the UK is a positive selling point for the Island and a benefit to our way of life. The community as a whole needs to eat less processed and more fresh foods. The Markets have a lower reliance on pre-packaging, which allows produce to arrive in prime condition. Commercial diversity helps bring better food security for Jersey. Market traders by definition, have diverse marketing skills. They source produce from a wide range of suppliers which can bring advantages for their customers. The Markets help maintain and develop training for a wide food industry skill base for the Island. The contribution the Markets make to maintaining and potentially improving Jersey's carbon footprint is not discussed in the IP. It is centrally located for both freight in from the Port</p>			

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								and the Island's road network for receiving local produce, and a short travel distance for a large proportion of the population. It makes little sense to isolate the Markets. The full consequences of closing Halkett Place to traffic, failing to provide adequate parking provision and assuming the shopper will willingly walk up to 500 metres with heavy bags, represents for me, the planners crossing the line of acceptability. Where on this little Island, could this large area of food retail space be relocated and what damage to the community, should the existing Markets have a significant failure			
DP424		David Dodge	Vienna Bakery	Proposal 18	Pedestrian Priority	Objecting	I call for a thorough review of our strategic planning process, based on the principles of gathering objective evidence on the community's economic and cultural needs. See attached letter	Because I believe this task is not complete. I specifically object to the proposal to close Halkett Place (8.43) draft Island Plan (IP) and the strategic thinking behind this proposal because I believe it will seriously threaten the future ability of the Markets to operate in an effective manner to the detriment of the public. The aim of the proposed road closure is to reduce the impact on pedestrians by cross-town traffic. However, it risks driving heavy bag food shoppers away from the St Helier Markets if adequate, safe and convenient alternatives are not provided. St Helier must be accessible if it is going to be able to compete and adapt. The current parking provision for the north of town is insufficient. The draft IP and awaited Sustainable Transport Policy (STP) have used a benchmark of the existing car park provision as a target, when this is inadequate. The IP and STP appear to confuse essential food shopper traffic with commuters who may be better able and prepared to walk 300 to 500 metres from the bus stop or edge of town transport hub to their destination. It appears the consumer choice to buy fresh food on a regular basis throughout the week in St Helier in a Continental lifestyle is becoming an anti-social behaviour. There may be untried or ignored potential opportunities for the provision of parking that would interrupt the gyratory hunt for a parking space, before shoppers cars come to the core of town. The focus for car park provision appears to be confined to the Public land when private developers may have appropriate opportunities. There is reluctance in government to lose "control" of car park service provision.	Reject	The proposals for pedestrian priority have emerged from work which has looked at the overall development of St Helier, based on the work undertaken by Willie Miller (St Helier Urban Character Appraisal: 2005) and EDAW (St Helier Development and Regeneration Strategy), the proposals emerging from which have been assessed and modelled by the strategic highway authority (T&TS), which is also responsible for the provision and management of public parking provision. As stated in the proposal, and the supporting justification, the development of specific schemes in relation to the streets identified will be the subject of detailed engagement and consultation, and the impact upon viability and vitality will be a material consideration	The Minister is not minded to amend the draft Plan
DP701		Mr Mark Syvret	Romerils	Proposal 18	Pedestrian Priority	Objecting	[Page 289 Proposal 17, Open Space Strategy. Page 308; sections 8.41,8.42, 8.46, 8.47 and Page 334 Policy TII3, Protection of the Highway Network.] 1. Dumaresq Street (west end) is annotated on the Draft Island Plan town Proposals Map as both		Reject	The Plan makes it clear that there would need to be further development of these proposals into detailed pedestrian priority schemes, which would be the	The Minister is not minded to amend the draft Plan

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							a Primary Route network and a Potential Pedestrian Priority Street. How can a Primary Route only allow [8.42] cyclists, taxis, buses and trade deliveries? 2. [8.4 l] states "an extension of pedestrian priority is considered necessary to support the viability and vitality of the town centre," [8.47] refer to Hue Street becoming a pedestrian priority street whereby access would only be for cyclists, taxis, buses and trade deliveries. Hue Street has wide pavements and a relatively low traffic volume , the majority of which is seeking access to Romerils and the collection point for Marks & Spencers in Dumaresq Street. 3. [Proposal 17.] How can partial pedestrianisation provide "quality open space" in this area? Whilst pedestrian safety is important we OBJECT to this proposal as access to our car park in Hue Street would therefore be impossible and our business would be severely hit. Suggested change: Do not partially pedestrianise. It is not needed.			subject of further consultation, and which would need to take into account their impact upon existing commercial operations and facilities. The redevelopment of off-street surface level car parking provision in St Helier is consistent with Policy TT10 of the draft Plan and has the potential to deliver a better environment in this part of the town, as identified in the EDAW report (p.49). Any potential changes to the management of traffic in the area may present opportunities to implement further environmental improvements in the street, as has been achieved in other parts of St Helier under the auspices of the Street Life Programme e.g. York Street, Charing Cross, Sand Street and Broad Street. The physical constraints of the western end of Dumaresq Street are self-evident and present vehicular and pedestrian conflict. It is, however, recognised, that Dumaresq Street provides, amongst other things, service access to major stores with frontages on King Street, as well as Romerils and, on this basis, Dumaresq Street is a significant part of the strategic highway network. Alternative access to Romerils and the rear of King Street stores is, however, available from Union Street. The implications of any changes to traffic management would need to be modelled and assessed in consultation with key stakeholders, including commercial operators in the area.	
DP924		mr daniel wimberley			Cycle Routes	Objecting	Proposed cycling networks and walking networks need to be thought through and created and then protected just there is a commitment to safeguarding open space and not "letting it go" (page 294) REC that the commitment to do this is written into the Plan, plus the provision that they be safeguarded, and planning decisions then have regard to these routes (NB most likely existing		Accept	The protection of the Island's footpath and cycle network is covered by Policy TT1	The Minister notes the comment but is not minded to amend the Plan and this issue is already dealt with (Policy TT1)

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							roads, of course)				
DP682		Pauline Harewood		Map 8.1	Eastern Cycle Route Corridor	Neither	happy with Eastern cycle route proposal but there is no proposal for a Western Cycle Route. ie from St Ouen's Bay to link into St Peter's track. There are several valleys exiting the bay which would lend themselves to this facility.	All routes out of the bay are steep hills, of varying gradients, which unless you are a mega fit cyclist, requires pushing your cycle some distance. A beautiful peaceful meandering route out of the bay (similar to the Railway Walk in St Brelade) would be wonderful. It would also make cycling for children safe as there would be no cars.	Noted	Policy TT3 would support and enable the development of other off-road cycle facilities anywhere in the Island, including any link from St Peter's Village to St Ouen's Bay.	The Minister notes the comment made but is not minded to amend the draft Plan
DP10		Mr Philip Johnson		Policy TT 3	Cycle Routes	Supporting	8.57 There should be a timescale for the minister to act. The sooner the better.		Noted	The implementation of the Eastern Cycle Route will be dependent on many aspects not least the definition of a route, and the availability of resources and the agreement of landowners and other local stakeholders. The Island Plan can provide a policy framework to support and enable the development of a route, but not to define the timetable for implementation, which is dependent upon many aspects out with the scope of the Plan.	The Minister is not minded to amend the draft Plan.
DP181		Mr Stephen de Gruchy		Policy TT 3	Cycle Routes	Supporting			Noted	Noted	Support is noted by the Minister
DP753		Paul Harding	The Association of Jersey Architects	Policy TT 3	Cycle Routes	Supporting	The AJA supports these Policies		Noted	Noted	Support is noted by the Minister
DP182		Mr Stephen de Gruchy		Policy TT 4	Cycle Parking	Supporting			Noted	Noted	Support is noted by the Minister
DP183		Mr Stephen de Gruchy		Policy TT 5	Road Safety	Supporting			Noted	Noted	Support is noted by the Minister
DP958		Deputy Philip Rondel	Parish of St John Working Party	Policy TT 5	Road Safety	Neither	Both 'Villages ' lie on important cross island routes. St John's Village lies on the main East - West route from St Ouen to St Martin as well as being the northerly point of the Grande Route de St Laurens from the South. Sion Village is on the main North - South route from Hautes Croix to St Helier. There are 30 mph limits in place in both 'Villages' but crossings for pedestrians, safe bus stops and lower speed limits or traffic calming measures may be required. Pedestrian safety is at risk in both Villages. The group wants to find out from parishioners ' their views on traffic and		Noted	Policy TT5 supports the introduction of traffic and pedestrian safety measures, and policies TT2 and TT3 support the creation of new facilities for pedestrians and cyclists. Some traffic management issues (e.g. speed limits) are out with the remit of the plan and are issues to be dealt with by the Island's strategic highway authority.	The Minister notes the comment in relation to this policy

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							pedestrian safety, before making any recommendations. In the past parishioners have rejected changes to speed limits with the Consultation Zones albeit many have raised their concerns on this subject. Cycle safety and Safe Routes to school are also areas that the Working Party will be consulting on. Early indications are that these are a high priority following comments received by the Working Party.				
DP184		Mr Stephen de Gruchy		Policy TT 6	Park and Ride	Supporting			Noted	Noted	Support is noted by the Minister
DP185		Mr Stephen de Gruchy		Policy TT 7	Better Public Transport	Supporting			Noted	Noted	Support is noted by the Minister
DP187		Mr Stephen de Gruchy		Policy TT 8	Access to Public Transport	Supporting	Support with caveat I think the requirements of the second paragraph would be unduly onerous for a developer of 5 units and, possibly, commercially unrealistic. I think a more proportionate approach would be to apply the requirements of the second paragraph only where the development is for 10 units or more.		The comments made are noted and accepted.	The Minister is minded to amend the draft Plan to raise the threshold of this policy to relate to 10 units of residential accommodation and also to introduce thresholds for employment-related land uses, of 250sqm for office use, 500sqm for retail use, with other uses being considered on their likely employee numbers and generation of traffic.	The Minister is minded to amend the draft Plan
DP589		Deputy John Le Fondre		Policy TT 8	Access to Public Transport	Neither	Access to Public Transport - infers that some form of commuted payment might be required to fund public transport. To me this would seem to require the establishment of some form of endowment fund which could then generate income to provide such public transport facilities.		Noted	Any financial contribution to support the provision of public transport can be managed through the mechanisms already established for Planning Obligation Agreements, where a contractual arrangement is entered into to specifically establish the purpose and amount required to fund a specific element of work or service required to be provided in association with development activity (see Policy GD4).	The Minister notes the comments made but is not minded to amend the draft Plan.
DP751		Paul Harding	The Association of Jersey Architects	Policy TT 8	Access to Public Transport	Objecting	12.3 The AJA submits Objective TT1 and Policy TT8 puts the cart before the horse, through insisting that development forms and patterns are located near to existing Island Route network of public transport provision. The precept is we accept the existing transport system is all that can be achieved. Instead the AJA believes we should place housing in the most appropriate locations, then provide the transport system to serve those		Reject	The objective of Policy TT8 is not to constrain new development (where it accords with the Spatial Strategy of the Plan), where it is not within 400m of the existing public transport route network, but rather to ensure that the public transport route network is developed and enhanced to	The Minister is not minded to amend the draft Plan

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							locations. 12.4 There is no justification for TT8 imposing a 400 metre limit on distance of new housing or employment related development from the current public transport service. The existing Island Network is not cast in stone.			ensure that those locations most appropriate for development receive a better level of public transport provision than that which they might currently receive.	
DP880		Mr Stephen D Smith	Health Protection Services	Policy TT 8	Access to Public Transport	Supporting	The presumption should be for new commercial development to contribute more to public transport use thereby reducing car use and reducing noise and exhaust emissions.		Noted	Noted	Support is noted by the Minister
DP1062		Ray Shead	The Jersey Chamber of Commerce	Policy TT 9	Travel Plans	Supporting	This policy is agreed with reservations. It is agreed that large developments of any type should be evaluated for their impact on traffic and note that schools are now recognised as having an effect on traffic. However, this policy TT 9 only mentions residential development with 50 or more units of accommodation. It is suggested that it should also include schools and offices. Residential development is far more difficult to provide a plan for as it is not a business with set working hours and its occupancy will determine the broad travel profile but will always be subject to random journeys because of its very nature. In terms of office development, members of Chamber have seen the reluctance of tenants to accept the imposition of travel plans which may have been accepted by the Developer during the planning process or the building may have changed ownership resulting in the recognition of a travel plan becoming diluted or obscured. The proposal to enforce the requirements is noted as is the statement that "Examples of enforcement might include the introduction of parking charges for staff". That proposal will prove extremely unpopular and unacceptable to building owners, occupiers and staff. The consequence of introducing monitoring and sanctions will be that new developments will be devalued in the eyes of potential tenants and the States will be required to create a new department to monitor and enforce travel plans. Whilst it is agreed that travel plans should be a requirement of the process, they should be structured in such a way as to provide a reasonable solution that does not require monitoring and sanctions. The provision of parking, charges for it and alternative types of transport should be part of a wider strategy for the Island and St. Helier which does not fall on the building owner.		Note qualified support	Policy TT9 would apply to all developments which generate significant amounts of travel and para. 8.33 of the supporting justification seeks to identify those types of development that might invoke this requirement. It is thus clear that the policy does not just apply to residential developments of over 50 units of accommodation and would embrace large office developments and schools. The objectives behind travel planning require some ownership and enjoyment from the users of buildings. It is a tool which seeks to influence behaviour. On these bases, there has to be a requirement to monitor their use and implementation. With changing users or occupants of buildings, there may be a requirement to amend Travel Plans to ensure that objectives and targets remain realistic: this will need to be done through negotiation and mutual agreement. The development of travel planning in Jersey is regarded as an integral element of the Island's Sustainable Transport Policy and will be managed between the departments of Planning and Environment and Transport and Technical Services within existing resources. It is acknowledged that there may be a requirement for further assistance and guidance on the development, implementation and monitoring	The Minister notes the qualified support for this policy but is not minded to amend the Plan

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										of travel plans in Jersey.	
DP188		Mr Stephen de Gruchy		Policy TT 9	Travel Plans	Supporting			Noted	Noted	Support is noted by the Minister
DP117 7		mr daniel wimberley			Parking	Objecting	REC Saving and re-allocating car-parking space in the town, and not all for housing, is another thing that should be in the Plan. Also REC the figures sent to me in a recent Written Question about the spaces in town which could be freed up for development, their area and potential and value SHOULD BE stated clearly in the plan. As should the number of spaces controlled by the States in the parish of St. Helier, together with some serious discussion about the potential uses and value of these spaces. This is a land-use Plan, is it not? See 2.13 page 35 and 2.34 where the need to use land very wisely is correctly pointed out		Reject	The inefficient use of land for car parking is acknowledged in the draft Plan (@8.111) and the development potential of some car parking space is also explicitly acknowledged (@ 8.114-8.115). Policy TT10 sets out a clear presumption in favour of the redevelopment of surface-level off-street car parks and presumes against the use of cleared sites for car parking on a temporary basis. The extent of car parking provision and its use is clearly set out in the draft Plan at 8.88 - 8.126.	The Minister notes the comments made but is not minded to amend the draft Plan as the issues raised are already adequately addressed.
DP100 2		Captain Howard Le Cornu	States of Jersey Harbours		Public Parking Provision	Neither	There are currently only 50 car parking spaces at the existing Waterfront MSCP, not 150 as stated.	Policy should also specifically take into account parking for users of the port. Within the port operational area, priority must be firstly given to warehousing and trailer parking, then parking for other users of the port, and finally public parking. Parking for even for Port Users within the Designated Port Operational Area may be compromised by the priority ,need for warehousing and trailer parking.	Noted	The provision of parking at the Port of St Helier should reflect the use of the land and should be regulated through the development control process in accord with parking guidelines. The provision of any public parking at the Port should likewise seek to reflect the function of the port as one of the island's principal gateways, and should seek to meet the reasonable expectations of passengers and other users of the facility. The provision and management of any other public space should seek to contribute towards the States objectives of seeking to reduce the peak hour traffic flow and of encouraging more sustainable modes of transport.	Noted by the Minister
DP106 1		Ray Shead	The Jersey Chamber of Commerce		Public Parking Provision	Objecting	8.97- The shopper is being caught up in the ambition to reduce commuter traffic by 15%. The policy to reduce car usage by deliberately not providing efficient and convenient shopper parking provision in St Helier is illogical and threatens services, environmental objectives and our economy. Whilst the commuter may benefit from a 300-500 metre walk from car park to destination, this is unacceptable for food		Reject	The draft Island Plan does not seek to reduce overall off-street public parking provision and does not seek to reduce the level of parking provision available to the shopper: it is a stated objective of the Sustainable Transport Policy to reduce peak hour traffic flow (which must be presumed to be	The Minister is not minded to amend the draft Plan.

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							shopping. 8.98 - 8.101. The base line provision of shopper parking is inadequate in this area. It is suggested that if the retail floor space of St Helier Markets were translated into a UK superstore, it would demand a car park 20% bigger than Minden Place MSCP. The NTMP was not instructed to find solutions to shopper parking because this was deliberately missing from its terms of reference. It is therefore implied that the strategic process is hostile to the logistics of retailing, other than localised chance sales. 8.102 - 8.126 Much has changed in the international economic and local political climate since this consultation was first published. It is vital that the strategic planning process is well informed as to the economic and social consequences of its proposals and that we are following the best strategic planning practises available.			predominantly commuters) and the Island Plan seeks to contribute towards this. The Plan seeks to ensure that the level of off-street public car parking presently provided by Minden Place is replaced. UK planning guidance (Planning Policy Statement 4: Planning for Sustainable Economic Growth, (29 December 2009)) defines, for retail purposes, a location that is well connected to and within easy walking distance of the primary shopping area as being within up to 300 metres. It is relevant to note that the Ann Court site is within 300 metres of the Central Market and within 100m of the edge of the Core Retail Area. This will provide a much larger facility than the existing Minden Place MSCP in that it also seeks to replace the existing public provision at Gas Place.	
DP590		Deputy John Le Fondre			Public Parking Provision	Neither	Ref para 8:98 Minden Car Park - I agree that the layout is inefficient. I am divided over whether all parking provision should be removed from this site. I think this overlooks the very important contribution to elderly motorists who find the car park very convenient for the Library, the Fish Market the Central Market and other facilities in that area. Even moving that particular provision a few hundred yards might well impact upon the utility of that service, again to the detriment of that area. I therefore lean towards retaining an element of parking at Minden, with some form of development (residential ?) on top. The design would need to be significantly better than at present to assist in the regeneration of the area. Talman parking - whilst not the direct responsibility of the States, I consider that private parking should (ideally) be replaced in the same area of Town.		Reject	The location of new public car parking to serve the North of Town will be determined as part of the NoT Master planning exercise. The existing Minden Place facility, whilst located close to the town centre, is relatively distant from the Ring Road, and thus serves to draw vehicular traffic through the town centre, which serves to undermine pedestrian safety and the quality of the town centre environment. In accord with the objective of seeking to reduce peak hour traffic flow; to encourage more sustainable modes of travel; and to reduce the inefficient use of town centre land for surface car parking, it is not proposed to replace the existing level of parking provision on the Talman site (ref Para 8.100). Whilst the comments about access for more elderly members of the community are noted, there are other shopper parking facilities in	The Minister is not minded to amend the draft Plan.

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										close proximity to the town centre e.g. Snow Hill and Sand Street, and the proposed re-introduction of the Town Hopper Bus may serve to provide a link between peripheral car parks and the town centre sites, such as the Central Market.	
DP1063		Ray Shead	The Jersey Chamber of Commerce	Policy TT 10	Off-Street Public Parking Provision in St Helier	Objecting	This policy needs to be reviewed in light of no progress with the Esplanade Quarter and Ann Court. There should not be a presumption against temporary car parking if it eases the current situation. Policy TT10 is now obsolete. A comprehensive review should now be initiated in partnership with the community and commerce		Reject	There is no requirement to review car parking proposals for the Esplanade Quarter: the proposal is to ensure that the existing off-street public parking facility is replaced in the event that the site is developed, and this is considered to remain a valid and legitimate policy objective. Likewise, the proposal to develop a new public off-street parking facility at Ann Court remains valid in the sense that any new car parking provision for the North of Town needs to be based on a replacement on existing levels of provision and not on the provision of additional capacity. The exact location of any new replacement facility will be determined through the North of Town Master planning exercise, which is still ongoing. It is not considered appropriate that land is used, whether on temporary basis or permanently, for off-street public car parking as this only serves to undermine other stated objectives of seeking to encourage more sustainable modes of transport than the private car. There are also a number of instances around the town where temporary consents for a use of this nature can become semi-permanent, further undermining the objective of seeking to manage demand.	The Minister is not minded to amend the draft Plan
DP189		Mr Stephen de Gruchy		Policy TT 10	Off-Street Public Parking Provision in St Helier	Supporting	Support with caveat I support this policy in all respects except for the final paragraph. As areas of current off-street private car parks are redeveloped, there would be merit in allowing other areas pending redevelopment to be used, temporarily, for private car-parking. Otherwise,		Note qualified support, but reject suggestion of	The relatively high level of car parking space in St Helier is considered to be a significant factor in influencing the scale of morning peak hour traffic flow into the town by private car. The	The Minister notes the qualified support for this policy but is not minded to amend the draft

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							unnecessary pressure may be put on existing public car parking sites. Perhaps setting a maximum time limit of, say, 2 years as a temporary car park might address the concern mentioned in 8.115 that allowing temporary car parking may act as a disincentive to the active redevelopment the site.		allowing temporary use of cleared sites for car parking provision.	use of land for private car parking in the centre of St Helier is also not an efficient use of land when there are greater needs to provide land for homes and public open space. As a general principle, therefore, it is not considered appropriate that land is used, whether on temporary basis or permanently, for an activity which can only serve to undermine other stated objectives of seeking to encourage more sustainable modes of transport than the private car. There are also a number of instances around the town where temporary consents for a use of this nature can become semi-permanent, further undermining the objective of seeking to manage demand.	Plan.
DP591		Deputy John Le Fondre		Policy TT 10	Off-Street Public Parking Provision in St Helier	Supporting	Replacement Parking - in my view it is critical that replacement parking is provided in this area of town.		Noted	Noted	Support is noted by the Minister
DP719		Mr Kenneth Renouard		Policy TT 10	Off-Street Public Parking Provision in St Helier	Neither	There is also not enough allocated cycle, motor cycle or car parking spaces for those that commute to work. An increased number of both cycle and motor cycle spaces may encourage commuters to take a 'greener' form of transport in the warmer months, which will reduce congestion on the roads, when the number of visitor cars on the road increases.		Noted	It is a stated objective of the Plan to encourage more sustainable modes of transport than the private car. On this basis, the Plan does not seek to increase the provision of more car parking spaces for commuters, which would only serve to undermine this objective. Policy TT4 of the Plan seeks to ensure the provision of new cycle parking in association with new development and as part of a parking strategy for the town of St Helier. The Plan does not specifically seek to encourage or provide for the provision of parking spaces for powered two-wheelers but regards this as an issue for the strategic highway authority in terms of the management of existing parking provision and the extent to which that space is dedicated to	The Minister notes the comments made but is not minded to amend the draft Plan.

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										meeting the needs of motorcyclists compared to car drivers.	
DP754		Paul Harding	The Association of Jersey Architects	Policy TT 10	Off-Street Public Parking Provision in St Helier	Objecting	12.7 There is a contradiction between earlier Policies of restricting new employment related development within St Helier and the 2009 Draft Plan policy of restricting St Helier public off-street parking facilities as well as refusing private car parking, in conjunction with the current ongoing reduction in public on-street parking. This will diminish St Helier's retail & commercial activity, rather than enhance St Helier as the Island's vibrant business centre. It should be recognised the Island does not have a real traffic problem (there is very little congestion on the main arterial roads except short peak periods) and public transport is not the panacea for all travel issues.		Reject	The ability to park is fundamental to the use of the private car and the availability of parking at the start and end of each journey is a critical factor in car use. As a means of seeking to reduce car use, specifically peak hour traffic flows, and to encourage the use of other, more sustainable modes of transport, it is considered appropriate to regulate the level of off-street public (and other) parking provision. It is acknowledged that there is a need to ensure that, as the Island's principal commercial and retail centre, St Helier remains convenient and accessible to use: to ensure the continued vitality and viability of the town centre's retail function there is a need to ensure appropriate levels of provision of shopper car parking space, relative to that which is available for commuters. This is, however, a matter of management of the Island's existing stock of off-street public parking provision by the strategic highway authority.	The Minister is not minded to amend the draft Plan
DP592		Deputy John Le Fondre			Residents' Parking Zones	Neither	Car ownership - the paragraph talks about not encouraging car ownership, yet this appears to be in direct conflict with the remarks in 8.14		Noted	Paras 8.121-8.124 reflect what has happened in terms of the initiative being pursued by the Parish of St Helier to introduce Residents' Parking Zones. The draft Plan acknowledges that such schemes have the potential to increase car ownership but also have the potential to reduce the need for unnecessary trips.	Noted by the Minister
DP1064		Ray Shead	The Jersey Chamber of Commerce	Policy TT 11	Private Car Parks in St Helier	Objecting	This policy should be reviewed and fair competition should be allowed, as if not, it will appear that the States is seeking to protect its monopoly.		Reject	The presumption against the provision of further private non-residential car parks accords with the objective of seeking to manage levels of peak hour traffic flow and to encourage other, more sustainable, forms of travel, both of which have public benefit. The issue of competition,	The Minister is not minded to amend the draft Plan

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										in relation to the provision of parking supply, is not material to a land use planning policy framework	
DP190		Mr Stephen de Gruchy		Policy TT 11	Private Car Parks in St Helier	Supporting			Noted	Noted	Support is noted by the Minister
DP755		Paul Harding	The Association of Jersey Architects	Policy TT 11	Private Car Parks in St Helier	Objecting	12.7 There is a contradiction between earlier Policies of restricting new employment related development within St Helier and the 2009 Draft Plan policy of restricting St Helier public off?street parking facilities as well as refusing private car parking, in conjunction with the current ongoing reduction in public on?street parking. This will diminish St Helier's retail & commercial activity, rather than enhance St Helier as the Island's vibrant business centre. It should be recognised the Island does not have a real traffic problem (there is very little congestion on the main arterial roads except short peak periods) and public transport is not the panacea for all travel issues.		Reject	The ability to park is fundamental to the use of the private car and the availability of parking at the start and end of each journey is a critical factor in car use. As a means of seeking to reduce car use, specifically peak hour traffic flows, and to encourage the use of other, more sustainable modes of transport, it is considered appropriate to regulate the level of private (and other) parking provision. The use of land for the purposes of private car parking is also considered to be highly inefficient, particularly where there is a need for land to be released to provide for new homes.	The Minister is not minded to amend the draft Plan
DP191		Mr Stephen de Gruchy		Policy TT 12	Parking Provision Outside St Helier	Supporting			Noted	Noted	Support is noted by the Minister
DP756		Paul Harding	The Association of Jersey Architects	Policy TT 12	Parking Provision Outside St Helier	Objecting	It is strange the 2009 Draft Plan recognises the problematic lack of public parking within areas such as St Aubin, Gorey & Rozel and, rather than proposing a solution, derives a policy against provision of new public parking unless alternatives have been supported. The policy fails to recognise the benefits that can flow from adequate public parking in satellite centres such as St Aubin, where adequate public parking coupled with public transport to / from St Helier (park and ride) has the potential for eliminating peak hour congestion from the western residential areas to St Helier, in both directions.		Reject	The policy seeks to ensure that the private car does not dominate or destroy the environment which may generate the demand for car parking in the first instance, which would be contrary to the strategic objectives of the Plan to protect the natural and historic environment, and also to reduce our dependence on the car (SP4 and SP6). The Plan does seek to enable the provision of facilities related to the concept of park and ride, at Policy TT6, where it is appropriate to do so. It is also suggested, however, that given the often cited perception of a lack of parking to meet local demand in the picturesque, historic, environmentally	The Minister is not minded to amend the draft Plan

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										sensitive and constrained landscape setting of St Aubin, the provision of parking facilities to ease congestion in St Helier in this location is not something that is likely to be easily achieved. In this context, it is relevant to note that there is a presumption against land reclamation, as set out at Policy WM9. It is also relevant to note that the existing transport infrastructure between St Helier and St Brelade in particular, vis-à-vis the frequency of bus services and the availability of off-road cycling and pedestrian routes (provided by the Railway Walk and the Esplanade) probably provides the greatest level of choice of easy and convenient transport options, when considering more sustainable alternatives to the private car, than anywhere else in the Island.	
DP116 2		Mr Kenneth Renouard		Proposal 19	Parking Guidelines	Objecting	With regard to the policies on the redevelopment of St Helier, I believe there is a need for more emphasis to be placed on the requirement for parking spaces for new residential developments.	At present town residents are isolated, as there is insufficient provision for visitor parking. The parish policy of creating residential parking zones has only exacerbated this isolation. Relatives and friends often have to park and walk 15 minutes or more. This I have experienced firsthand. Therefore new residential development should include a requirement to provide both resident and visitor parking spaces wherever possible. The Parish of St Helier should at least re-consider some of their residential parking zones that are further from Public Parking.	Reject	In order to reduce the increasing use of the private car, car parking standards are likely to be reduced. Provision will, however, need to be made, where appropriate, for adequate visitor parking. In St Helier, there also remains provision of public parking facilities which is available to car-borne.	The Minister is not minded to amend the draft Plan
DP192		Mr Stephen de Gruchy		Proposal 19	Parking Guidelines	Supporting			Noted	Noted	Support is noted by the Minister
DP193		Mr Stephen de Gruchy		Policy TT 13	Protection of the Highway Network	Supporting			Noted	Noted	Support is noted by the Minister
DP100 4		Captain Howard Le Cornu	States of Jersey Harbours		Potential Schemes	Neither	Policy should include locating warehouses at the port and in the right location to reduce lorry movements on public roads.		Noted	The policy seeks to address where, on the public road network, potential major changes to the road network are likely to be required. Unless the proposal to relocate warehouses within the port is likely to create any	The Minister is not minded to amend the draft Plan.

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										such significant changes in road infrastructure, this comment is not relevant to this policy.	
DP194		Mr Stephen de Gruchy		Policy TT 14	Highway Improvements	Supporting			Noted	Noted	Support is noted by the Minister
DP948		Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society		Air and Sea Travel	Supporting	Port relocation: The idea of moving the current port to La Collette is reasonable, not just because of land being released adjacent to the Waterfront, although from a planning perspective it must improve the offering of the Waterfront by not being adjacent to an industrial site, but also to enable usage by ships with greater displacements as is the trend with modern vessels.		Noted	Noted	The Minister notes the support for the concept of relocating the existing port
DP1006		Captain Howard Le Cornu	States of Jersey Harbours		Operational Development at Port of St Helier and Jersey Airport	Neither	Ref: 8.151: Incorrect - Freight into and out of Jersey is not generally declining. Overall it will grow in line with economic development and is directly linked to population growth. Ref: 8.152: Support This statement does not appear to be consistently taken into account throughout the rest of the plan. Ref: 8.153: Question - There are some very . Specific statements made here without supporting evidence. e.g. Does the Island require 24 hour access for all areas of the port? There are various implications to this statement including resource implications and , 'bad neighbour' impacts on surrounding property. Ref: 8.154: Clarification required As suggested above, a 'Jersey Harbours Regeneration . Zone' would ensure a co-ordinated approach to these issues Ref: 8.155: Incorrect statements made It is incorrect to state that revenues from the current port operation cannot support a major capital improvement, although it may not be funded through the normal capital programme. Ref: 8.156 supports: We agree with this statement however it is inconsistent with the rest of the document and needs to be carried through. It could also be supported by the re-inclusion of T135 from the existing Island Plan. Ref: 8.157: Object: The port operational area is not defined in the Plan or on the Proposals Map. Ref: 8.158 Support: Ref: 8.159 Incorrect: Other marine activities are not considered elsewhere in the plan, specifically commercial fishing and marine leisure activities including the provision of marina facilities .		Reject	Annual tonnage in sea freight has dropped continually from 538,000 tonnes in 2000 to 395,000 tonnes in 2009 and thus the trend can only be described as 'declining', despite increases in population and economic activity over this period. These figures are published in 'Jersey in Figures' and are sourced from Jersey Harbours. No evidence to the contrary is provided. The policy regime provided by Policy TT35 of the 2002 Island Plan is replicated in Policy TT15 of the Draft Island Plan. The definition of the operational area of the Port is dealt with at TT15. Other marine activities, including fishing and fish farming and marine leisure and marinas, are dealt with in other parts of the Plan, specifically policies ERE8 and NE5 respectively	The Minister notes these comments but is not minded to amend the Plan
DP1007		Captain Howard Le Cornu	States of Jersey Harbours	Policy TT 15	Operational Development at the Port of St	Objecting		The port operational area is not defined in the Plan or on the Proposals Map. As suggested above, a 'Jersey Harbours Regeneration Zone' would ensure a co-ordinated approach to these issues in the same way as Jersey Airport at 8.160.	Noted	There is a requirement to define the operational area of the Port of St Helier to enable the application of Policy TT15. This will be addressed in the amended	The Minister is minded to amend the draft Plan to include the definition of the

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					Helier and Jersey Airport					draft Island Plan: in the absence of any proposals from Jersey Harbours, it is proposed that the operational area of the port be based on that presently defined in the 2002 Island Plan.	operational area of the Port of St Helier based on that presently defined in the 2002 Island Plan.
DP1065		Ray Shead	The Jersey Chamber of Commerce	Policy TT 15	Operational Development at the Port of St Helier and Jersey Airport	Supporting	Chamber supports the view that land for current and possible future operational function of St. Helier harbour and the airport is paramount over development for non-operational users.		Noted	Noted	Support is noted by the Minister
DP195		Mr Stephen de Gruchy		Policy TT 15	Operational Development at the Port of St Helier and Jersey Airport	Supporting			Noted	Noted	Support is noted by the Minister
DP990		Captain Howard Le Cornu	States of Jersey Harbours	Policy TT 15	Operational Development at the Port of St Helier and Jersey Airport	Objecting	There is no comment about a 'General Planning Order' for developments within the Designated Port Operational Area, which will give overriding planning guidance and ability to proceed with agreed 'Permitted Developments'.		Reject	It is considered that the policy regime conferred by draft Policy TT15 essentially provides a permissive framework for the operational development of the Port of St Helier, however, any such development proposals need to be considered on their merits and assessed, in particular, against other policies in the Plan, especially Policy GD1 and, where they affect structures and buildings of heritage value, Policy HE1.	The Minister is not minded to amend the draft Plan as the issues raised are already addressed
DP196		Mr Stephen de Gruchy		Policy TT 16	Aircraft Noise Zones	Supporting			Noted	Noted	Support is noted by the Minister
DP197		Mr Stephen de Gruchy		Policy TT 17	Airport Public Safety Zones	Supporting			Noted	Noted	Support is noted by the Minister