

**DEPARTMENT OF THE ENVIRONMENT**

**Supplementary Planning Guidance –  
Development Brief, The Jersey Gas Land at Tunnel Street, St Helier**

**Appendix A: CONSULTATION FINDINGS AND RESPONSE**

**A) Numerical response to questionnaire**

<b>Questions</b>	<b>Strongly agree</b>	<b>Agree</b>	<b>Don't know</b>	<b>Disagree</b>	<b>Strongly disagree</b>	<b>No answer</b>
<b>1. The removal of a potentially hazardous use from a residential part of St Helier provides an over-riding justification to allow the redevelopment of the Jersey Gas site in Tunnell Street for another use..</b>	<b>10</b>	<b>10</b>	1	1	1	
<b>2. The redevelopment of this site for the provision of new homes represents the best use of this site.</b>	<b>8</b>	<b>7</b>	4	3	3	
<b>3. Given the location of this site, relatively close to town, it is appropriate for there to be flexibility in the level of car parking provision sought on the site.</b>	<b>10</b>	<b>7</b>	0	5	2	
<b>4. The proposed scale and quantum of development - of around 300 homes – is appropriate for this part of town and this site.</b>	2	7	2	<b>6</b>	<b>8</b>	
<b>5. The scale, massing and height of possible development is appropriate for this part of town.</b>	2	7	4	<b>5</b>	<b>7</b>	
<b>6. The provision of up to 138 off-street public car parking spaces, to be provided by the developer, is a reasonable requirement of any redevelopment scheme at the Jersey Gas site.</b>	<b>6</b>	<b>7</b>	4	2	6	
<b>7. The provision of a pedestrian link, between Tunnell Street and Belmont Road, is a reasonable requirement of any redevelopment scheme at the Jersey Gas site.</b>	<b>8</b>	<b>10</b>	3	1	3	
<b>8. The enhancement of pavements around the Jersey Gas site, is a reasonable requirement of any redevelopment scheme at this site.</b>	<b>11</b>	<b>10</b>	3	0	1	

<b>9. The architecture of any new development on this site should reflect the architectural character of the area.</b>	<b>15</b>	<b>5</b>	1	3	1	
<b>10. The architecture of any new development on this site should be unique and have its own character and identity.</b>	3	6	2	<b>10</b>	<b>4</b>	



## B) Response to representations received with the questionnaire returns

Representations / comments	Officer Response	Recommendation
<p><b>Q1. The removal of a potentially hazardous use from a residential part of St Helier provides an overriding justification to allow the redevelopment of the Jersey Gas site in Tunnell Street for another use.</b></p>		
<p>1 Having gas storage in a residential area is totally inappropriate</p>	Noted	No change
<p>2 A gas plant should not be in the middle of town and should be moved to a commercial site, as we have seen from the last fire at the gas works in tunnel street and Bunsfield petrolium explosion.</p>	Noted	No change
<p>3 Would agree residential development would enhance this area Although having lived as close as anyone to the gasometer for 30 years, i have come to accept the gas holder and view it as an iconic land mark</p>	Noted	No change
<p>4 It is just common sense</p>	Noted	No change
<p>5 For the health and safety of future eneration occupying the area, it is vital to clean the area from harmful gases and substances that can be a contributing factor to bad health within reason.</p>	Noted	No change
<p>6 Improving the environment around this busy area can only be a good thing.</p>	Noted	No change

7 i think we should remove hazardous waste but it shouldn't constitute a rebuild	Jersey Gas needs to realise an appropriate development value for the site in order to extinguish and relocate the existing hazardous use.	No change
8 Hardly an ideal site, relocation to an industrial area makes more sense.	Noted	No change
9 Land should be made available, but under no circumstances to be used for High Rise flats..!!!!!!	Noted	No change
10 We need more car parking space for commuters.	The development brief requires the developer to make provision for 138 public car parking spaces, which is consistent with the North of Town Masterplan	No change
11 but no housing in it's place., A car park or extension of the park would be a much better idea. Jersey does not need any more housing, it just encourages more to come here, and we already over-crowded. Over 3,000 empty properties tells it's own story.	The site is identified for residential development and public/private parking in Island Plan and North of town Masterplan	No change
12 Me & my family live 100 yards from this!!! Good enough reason	Noted	No change
13 BUT I WILL ONLY SUPPOR THIS IF ALL COSTS ARE BORNE BY JERSEY GAS - THEY HAVE CAUSED ANY CONTAMINATION AND SHOULD PAY TO CLEAN	The developer will be entirely responsible for the cost of decontaminating the site.	No change
14 It's a timely opportunity for a review of land use	Noted	No change
15 A gas storage facility should not be in a residential	Noted	No change



land to complement the town park.		
8 It should be a new car park	The development brief requires the developer to make provision for 138 public car parking spaces.	No change
9 There are more than enough flats in Jersey, let alone this area, a car park would be more realistic, at least it will in time pay for its self, and will compensate for the one that should have been built underneath the existing Town Park..!!	The Island Plan and North of town Masterplan look to concentrate residential development within the built up area and this site is considered eminently suitable for the use outlined in the draft development brief.	No change
10 We need more car parking spaces for commuters.	The development brief requires the developer to make provision for 138 public car parking spaces.	No change
11 Homes are good idea for the locals, but will only work if they have their own private parking	Noted	No change
12 Already a large residential area - and close to the new town park	Noted	No change
13 Though new homes are useful they are not exclusively only type of property to enhance life in St Helier	Noted	No change
14 There is a shortage of land for housing and homes are not only needed, they should improve the appearance of the area.	Noted	No change
15 New homes are required and it's proximity to town, the co-op & park will make it a desirable place to live	Noted	No change
16 the scheme must have a direct and clear link into the new Town Park and a high level of open public green space between the new housing to link Gas Place through the Jersey Gas site up to the tree lined	Noted	No change

<p>backdrop of the Victoria College / Beaulieu grounds on the headland above, so creating a strong visual link and a potential wildlife corridor into the heart of St Helier</p>		
<p><b>Q3. Given the location of this site, relatively close to town, it is appropriate for there to be flexibility in the level of car parking provision sought on the site.</b></p> <p>1 Town park should have had underground parking. Residential parking has been taken away in Robin Place. Where are town residents supposed to park?</p> <p>2 States of jersey missed the opportunity of building an underground car park under the town park, this opportunity should not be missed this time, although cost is a limiting factor in building underground a car park for up to 1000 vehicles would replace some that have been taken away and provide extra parking which will help to bring people back to town and encourage shop keepers to reinvest and rejuvenate town. Mr Crowcroft is removing parking for the public and turning it into residents parking this is also having a negative effect on town trading, so with a large underground carpark the hole of St Helier will benefit.</p> <p>3 Minimum parking only, the Co-op building was built to large as a Car Park on top of the Supermarket, they have now converted the parking area into retail space This building is oversized and does nothing for the townscape, infact it looks like a prison building i would not like to see a similar mess on the opposite side of the street</p> <p>4 if town revitalization is to take place for shopability parking facilities should</p>	<p>The development brief requires the developer to make provision for 138 public car parking spaces.</p> <p>The development brief requires the developer to make provision for 138 public car parking spaces.</p> <p>Noted</p> <p>Noted</p>	<p>No change</p> <p>No change</p> <p>No change</p> <p>No change</p>



be incorporated		
5 Essential! Parking is a nightmare in this part of town and becoming a serious problem. Public parking will ease the pressure.	Noted	No change
6 if we are wanting to reduce people driving into town we shouldn't build more car parks in town	Noted	No change
7 There should be sufficient parking for the number of units put on the site, as there is only limited parking in that area.	Noted	No change
8 I don't think accommodation should be built without adequate parking provision.	Noted	No change
9 Answer in previous question.	Noted	No change
10 Develop as a car park.	The Island Plan and North of town Masterplan look to concentrate residential development within the built up area and this site is considered eminently suitable for the use outlined in the draft development brief. The development brief requires the developer to make provision for 138 public car parking spaces.	No change
11 Too far from shops and offices - many office in financial sector have relocated to the Esplanade area - should be residential	Noted	No change
12 If we wish to encourage locals & visitors to town parking is expected	Noted	No change
13 Town living makes it much easier for households to rely on having just one car.	Noted	No change

<p>14 There should be one space for each home. Even if you live and work in town, most people still have a car &amp; there is already limited parking in the area.</p> <p>15 wouldn't it be great to have a car free scheme! but with good provision for pedestrians, kids and cyclist (St Helier meets the Byker Estate?)</p>	<p>The North of Town Masterplan acknowledges the Sustainable Transport Strategy which seeks to place less reliance on the car and more on alternative modes of travel</p>	<p>No change</p> <p>No change</p>
<p><b>Q4. The proposed scale and quantum of development - of around 300 homes - is appropriate for this part of town and this site.</b></p> <p>1 Four stories is too high and three hundred homes seems a bit excessive.</p> <p>2 Lee Homes with gardens going back to the old style of housing of family homes which are very much required, there are enough flats already with in St Helier.</p> <p>3 The proposed number of homes is far too high. Being close to the new Town park would be an opportunity to provide homes with more space - both the type of home being built an opportunity to build homes with reasonable sized rooms; and to give open spaces (eg plant trees, grassed areas) for people to be outdoors; plus provides parking space.</p> <p>4 This is overdevelopment , i understand the developer needs to maximize the number of units but i would strongly oppose high rise development, 3</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>No change</p> <p>No change</p> <p>No change</p> <p>No change</p>

stories maximum		
5 Make the most use of the site.	Noted	No change
6 So at least 600 parking spaces are required.	Noted	No change
7 Far too many for this area.	Noted	No change
8 There is more than enough empty flats, concentrate your mind on the root problem, OVERPOPULATION.	Noted	No change
9 Car park needed.	Noted	No change
10 To many - houses need gardens - small OK but needed. I do not agree that we should have an 'apartment mentality' as suggested by the previous planning Minister. Young families need play areas for the children – Dads should be able to kick a football and play with sons and Daughters should be able to play in the safety of their own garden	Noted	No change
11 300 seems excessive	Noted	No change
12 The draft brief does not provide enough information to make such a judgement possible.	Noted	
13 Area is already over populated with huge number of flats & bedsits. Many flats in other areas of town remain empty. People want houses with outside areas, not small flats. Three story town houses with roof gardens and integral garages would be more suitable to this site.	Noted	No change
14 Agree but depends on design valuse	Noted	No change

<b>Q5. The scale, massing and height of possible development is appropriate for this part of town.</b>		
1 Too high.		
2 The majority of dwellings in this area are currently two - three storey.	Noted	No change
Maintain the status quo and do not be greedy and over develop the area.	Noted	No change
High rise buildings provide homes, but also bring social problems with them, which then in turn costs the community / town money in the future.		
3 I live opposite the Gas Holder while i accept this is a large structure i would not like to see any building on this site that will effect my light, iews and privacy I have lived opposite this site for 30 years, in that time have had a ring road built around my property , a large housing development Salsbury Cresant, The Co-op building, La Masuiers Building I have lost sunlight, privacy, now have noise, light pollution, i think this area has had its fair share of over development	Noted	No change
4 Gas works is already high so won't make too much difference. Grande Marche is also bif so should blend in well.	Noted	No change
5 High rise flats are a major of Social problems, and are unsightly.	Noted	No change
6 Car park needed.	Noted	No change
7 No eight storey high rise, communal living not high rise ghettos.	Noted	No change

<p>8 Because there is provision for 6 floors which is completely inappropriate</p> <p>9 Town doesn't need anymore tower blocks. In future they will end up being an undesirable place to live from where I live, it will be a blot on the landscape.</p> <p>10 Agree but there is no requirement for a landscape architect to be involved at the outset and this is critical as the external spaces MUST be developed in tandem with the built forms and not added on afterwards.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>No change</p> <p>No change</p> <p>No change</p>
<p><b>Q6. The provision of up to 138 off-street public car parking spaces, to be provided by the developer, is a reasonable requirement of any redevelopment scheme at the Jersey Gas site.</b></p> <p>1 There has been a massive loss in residential parking in the area.</p> <p>2 Underground parking as explained in previous question.</p> <p>3 If the proposed 300 homes are built . . . that is an expected 300 vehicles.</p>	<p>The draft brief is consistent with the North of Town Masterplan which requires the development of the Jersey Gas site to provide 138 public car parking spaces.</p> <p>Noted</p> <p>Noted</p>	<p>No change</p> <p>No change</p> <p>No change</p>

<p>One per home. Thus trying to force people to find parking away from their homes is unreasonable. In the UK Planners have done this - to meet Government directives to be green and force people not to have cars; but householders having cars and/or motorcycles is a given fact and the towns I know over in UK where they have not provided parking for the number of homes (such is proposed in this plan) have problems with cars "abandoned" everywhere and causing problems with traffic flow especially for emergency services.</p>		
<p>4 Could be more. We lost a lot of spaces when Gas Place carpark was converted into Town Park.</p>	<p>The number of public car parking spaces required in the draft development brief is consistent with the North of Town Masterplan.</p>	<p>No change</p>
<p>5 Not if 300 homes are proposed!</p>	<p>Noted – see above</p>	<p>No change</p>
<p>6 There is an urgent requirement for many more car parking spaces particularly in this part of town as there are many businesses that need their clients to park.</p>	<p>Noted – see above</p>	<p>No change</p>
<p>7 Providing there are no high rise flats.!</p>	<p>Noted</p>	<p>No change</p>
<p>8 Car park yes</p>	<p>Noted</p>	<p>No change</p>
<p>9 could not agree more really!!!!</p>	<p>Noted</p>	<p>No change</p>
<p>10 I don't know enough about the economics of the development to comment. We need to clear cars off the streets, but spending money on handsome design is vital too.</p>	<p>Noted</p>	<p>No change</p>
<p>11 Any additional parking in this area will be of benefit</p>	<p>Noted</p>	







<p><b>Q9. The architecture of any new development on this site should reflect the architectural character of the area.</b></p>		
<p>1 Very few new properties look traditional which is a shame.</p>	Noted	No change
<p>2 But please no high rise blocks of flats . . . . St Helier has a lot of history and the influx of the modern Dandara, soul-less, is destroying the character of the town. Lets have some pride in the heritage and build properties that look solid, have character, that people are proud to live in.</p>	Noted	No change
<p>3 I would like to see the development in keeping with surrounding area</p>	Noted	No change
<p>4 It's already a mix and match of building designs from different areas surrounding the area. As long as isn't an eyesore I don't think it matters too much. No matter what is decided there will always be haters.</p>	Noted	No change
<p>5 I don't feel there is any standard architecture in that part of town - its higgledy piggedly</p>	Noted	No change
<p>6 What architectural character !! Even the new buildings are fairly horrible. The planning minister should not be able to start insisting on his own preferred style of building, or insisting on world renowned architects. Of greater importance is that the buildings are build to a good standard with decent materials that will last.</p>	Noted	No change
<p>7 This would be a most welcome change as parts of</p>	Noted	No change

<p>town i.e. the Esplanade - no note of any previous architecture/character has ever been taken into consideration.</p> <p>8 Agree, only if the development is much smaller than what is proposed.</p> <p>9 Providing there are no high rise flats.!</p> <p>10 no comment</p> <p>11 The existing style of the area is gracious and gives it its identity: stucco &amp; sash windows are synonymous with the most pleasing areas of St Helier.</p> <p>12 There is already a diverse selection of buildings in the area. There is no defined character &amp; few traditional buildings remain.</p> <p>13 The Golden Section works just as well horizontally as vertically and forms a major inspiration for our design work to this day</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>No change</p> <p>No change</p> <p>No change</p> <p>No change</p> <p>No change</p> <p>No change</p>
<p><b>Q10. The architecture of any new development on this site should be unique and have its own character and identity.</b></p> <p>1 Needs to blend in with the style of the old town.</p> <p>2 The architecture should BLEND in with the existing. Not be so unique that it does not fit in with the other older properties in the area. Give the properties the facade to blend in, but of course within the facade everything can be modern, eco, etc.</p>	<p>The guidance given in the North of Town Masterplan seeks to repair the existing form and character of the town</p> <p>Noted</p>	<p>No change</p> <p>No change</p>

3 I would like to see a connection with the past and some reminder that the site was formerly a gas works site and not lost totally as the Co-op building	Noted	No change
4 consistency and continuity brings harmony, too much variety confuses and loses its charm	Noted	No change
5 Not worried how it looks to be honest, as long as fit for purpose.	Noted	No change
6 I think they should fit in with our town and our island - why not more granite!	Noted	No change
7 Why ? It is better to have a good quality than some unique style!	Noted	No change
8 Providing there are no high rise flats.! p	Noted	No change
9 no comment	Noted	No change
10 The character of the area has been undermined by past developments. It's time for a scheme with the manners to integrate with its neighbours, not challenge them.	Noted	No change
11 Would need to be modern to fit in with its nearest neighbours – co-op & new Salisbury Crescent	Noted	No change

### C) Written comments from consultees

Comments	Officer Response	Recommendation
<p><b>Parish of St Helier</b></p> <p>The paper was discussed at the last Roads Committee meeting and the following points were raised:</p> <p>1. Whilst it is appreciated that the proposal suggests the inclusion of up to 138 public parking spaces the Parish believes this to be insufficient. With the loss of around 380 public car parking spaces from the Gas works and a further 230 private/public spaces from Talman this has resulted in residents and shoppers from the north east sector of town having to travel from locations as far away as Pier Road Car Park. The Parish believe that the number of public spaces provided by the development should be nearer 300 with at least half of these given over to residential use. Page 9 states that "In the event that this extent of public off street provision cannot be made on site, a commuted sum will be sought". The Parish believe this should be removed from the document and replaced with a firm commitment to deliver much needed car parking in this area as stated above.</p> <p>2. The brief alludes to 'providing the best level of amenity', the Parish feel this should be more specific and state the requirement for open space within the development to serve the needs of both young and old occupants of the development, particularly children's play space and area for passive enjoyment.</p>	<p>The draft development brief is consistent with the North of Town Masterplan, approved by the States in June 2011, the draft development brief requires the developer to make provision for 138 public car parking spaces. The suggestion that the commuted parking sum be deleted is noted.</p> <p>Noted</p> <p>Noted</p>	<p>No change</p> <p>No change</p> <p>No change</p>

<p>3. The proposal for the site to be 'genuinely publicly accessible' is welcomed and it is felt that this must include suitable links to the park on the west of the site so that cycle routes, pedestrian walkways and perhaps a jogging track can be incorporated into the design. The Tunnel Street elevation must incorporate space for road improvement and the installation of a wider footway to match up with the improvement line established in 1991 adjacent to the gas company houses.</p> <p>4. Consideration of the provision of a link road along the west side of the site should be included. The Committee feel that this should run from Tunnel Street to L'Avenue et Dolmen.....and link the two roads thereby providing a circulatory route to avoid a cul de sac arrangement in Tunnel Street. This road must incorporate suitable crossing points and be adequately traffic calmed.</p> <p>5. The Committee notes the Island Plan's references to a shortage of open space in St Helier and would like to see part of the Jersey Gas site used to extend the Millennium Town Park towards the ring road. This could allow for an open space corridor to extend from Bath Street to the Victoria College woodlands. It was noted that an extension of the Millennium Town Park was envisaged when the North of Town Masterplan proposals were being worked up for the area.</p>	<p>The proposals to create a link road along the west side of the site was not identified during the North of Town Masterplan consultation and is therefore inconsistent with the masterplan. The proposal would damage the amenity of the new park which seeks to reduce car accommodation and increase pedestrian accessibility.</p> <p>The suggestion to extend the town park is inconsistent with the North of Town Masterplan which, in addition to the recently developed town park, seeks to create public open space in Minden Place, Belmont Road and Ann Court</p>	<p>No change</p> <p>No change</p>
<p>Mr D. Dorgan</p> <p>I write to you regarding the above development as I am a resident of the area. Whilst I agree it is desirable to redevelop the area and remove the gasometer it is</p>	<p>Noted</p>	<p>No change</p>

<p>not at all desirable to replace it with another structure that is as tall as the present one. It should, in my opinion, not be any higher than the Co-op building which in itself is too high for the area.</p> <p>Please do provide parking for residents and as importantly their visitors. There is no public parking in the area for visitors as the resident parking scheme takes care takes up what little space there is. I am fortunate in that I have private parking.</p> <p>Having had a block of flats built next to our cottage recently there doesn't appear to be enough parking for the residents although it may be some of them do not wish to make best use of their parking facilities. Please, when considering building new flats look at the whole picture including those who will be living in them and the effect on the existing residents in the area less you end up tearing them down in 30years as not fit for purpose. Cramming people into a small site is just not good business.</p>	<p>The draft brief is consistent with the North of Town Masterplan which requires the development of the Jesrey Gas site to provide 138 public car parking spaces.</p> <p>Noted</p>	<p>No change</p> <p>No change</p>
<p>Minister for Transport &amp; Technical Services</p>		



<p>would then comprise a significant proportion of publically accessible parking. It is therefore essential that the States, through TTS, has full control and flexibility over the use of those spaces. It is also beneficial for the usability of the public, particularly visitors, for all public parking to have a consistent charging mechanism and to be part of a comprehensive system which can in the future be expected to include information systems on availability.</p> <p>It is therefore essential that the spaces to be provided by the developer are taken over by TTS and run as public car parking using what ever charging mechanisms, enforcement and control the States (TTS) consider appropriate at the time. The income from the parking spaces would be received into the car park trading fund to cover the administration and running costs of the car park and to contribute to the trading fund which is legally required to raise sufficient income to avoid falling into deficit allowing for a capital replacement programme. An allowance for buildings maintenance in relation to the 138 basement car parking spaces would be paid to the development.</p>	<p>The developer and the Minister for TTS will be required to enter into a planning obligation with the Minister for Planning and Environment in respect of the delivery of the 138 public car parking spaces. The POA will be the subject of negotiation and will cover all aspects of delivery, management and ongoing maintenance.</p>	<p>No change</p>
<p>Mr J Reed, Good Companions Club</p> <ul style="list-style-type: none"> <li>The Jersey Gas site could, in part, be used to provide new facilities for the club;</li> </ul>	<p>The points raised are noted. The Freedom Church recently acquired the Odeon Cinema and the Minister would suggest that the Club engages with Jersey Gas to explore</p>	<p>No change</p>



<ul style="list-style-type: none"> <li>• A town centre site can work well for a community facility of this type;</li> <li>• The existing office and showroom buildings could be converted and extended, with clear environmental benefits in the retention of the existing buildings;</li> <li>• The existing car park area could form the secure outside play area for a nursery and separate recreational area for users of the centre;</li> <li>• The existing offices and showroom would lend itself to the needs of the club with appropriate modifications. Is in easy walking distance of many who would use the centre and provides excellent vehicular access;</li> <li>• The remainder of the site could still be used for housing; possibly a retirement village complex.</li> </ul>	<p>the matter of possible acquisition further. In addition, a meeting with the Minister can be arranged to discuss the clubs requirements in addition to its negotiation with Jersey Gas.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>Doesn't</p> <p>No change</p> <p>No change</p> <p>No change</p> <p>No change</p> <p>No change</p>
<p>Jersey Chamber of Commerce</p> <ul style="list-style-type: none"> <li>• Welcome the draft consultation but hope that the final brief will be flexible an not prescriptive in relation to the North of Town Masterplan</li> <li>• That planning will give the application the importance it deserves;</li> <li>• Document refers to policy H3, the SPG for which is subject to approval by the States</li> </ul>	<p>The North of Town Masterplan was approved by the States in June 2011 as a blue print to regenerating this part of St Helier. Accordingly, the Minister is obliged to ensure that the brief is consistent with the approved masterplan.</p> <p>Noted</p> <p>Policy H3 was approved by the States as part of the 2011 Island Plan and referred to in the North of Town Masterplan. The Minister is obliged to refer to that policy as</p>	<p>No change</p> <p>No change</p> <p>No change</p>

<ul style="list-style-type: none"> <li>• The statement concerning tenure will require further clarification;</li> <li>• Policy E1 is becoming a sticking point for developments, the brief should categorically state that this will not be imposed upon this site;</li> <li>• Difficult to understand how commuted sums will help generate parking in the area;</li> <li>• The brief only refers to 180 residents spaces and 138 public spaces, leaving 120 residents spaces short – this will be a real issue for this area of St Helier;</li> <li>• Reference to the gas holder and the potential height opportunity – as it will be removed is height relevant and will this create precedent for other sites?</li> </ul>	<p>a material consideration and negotiate accordingly.</p> <p>Noted</p> <p>Policy E1 was approved by the States as part of the 2011 Island Plan, accordingly the site will need to be tested against that policy.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>No change</p> <p>No change</p> <p>No change</p> <p>No change</p> <p>No change</p>
<p>Mr B. Labey</p> <p>It is vitally important that each team competing for the design competition suggested for this project (at last!) must have a landscape architect as a fundamental and early part of the design team. If this is not specified as part of the brief the external spaces and the built forms will not relate in an optimal way and the site's relationship with the Town Park will be compromised.</p>	<p>Noted</p>	<p>No change</p>
<p>Mr C. Schofield</p> <p>SAVE Jersey's Heritage</p> <p>It's not clear from appendix whether the gas holder will be relocated to La Collette or replaced by alternative equipment. The maritime approach to La Collette is a source of humiliation for residents and dismay to</p>	<p>Jersey Gas have no intentions of relocating the existing, or constructing a new gas holder at La Collette.</p>	<p>No change</p>

visitors. This gateway to the island needs an urgent review. Existing eyesores need attention and no further eyesores should be allowed. Industrial plant need not be ugly but industrial sheds finished in beige tin always are. Please launch an urgent consultation to repair the current shambles. Do not allow this initiative to aggravate it.		
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## **D) Developers response**

14 May 2012

We refer to the above development brief issued on 20 April 2012 and set out below a formal response on behalf of our client, Jersey Gas/International Energy Group.

### **1. Removal of Potentially Hazardous Use**

The potential removal of the gas holder and gas compression equipment from Tunnell Street and the development of replacement facilities at La Collette forms part of a wider strategic review of its business operations by Jersey Gas and its proposals for the long term investment in this strategic Island utility.

A key priority for Jersey Gas is to ensure the continued security of gas supply to the Island in a manner that reduces risk and maximises efficiency and it therefore fully supports the objective of relocating primary plant and storage facilities to a less hazardous and intrusive location.

Alongside this, Jersey Gas is also considering options for the relocation of the Kosangas (Jersey) LPG operation from St John to La Collette which would also achieve an important relocation of a potentially hazardous use and associated reduction in LPG road tanker movements through St Helier to St John.

Given the substantial financial investment required to achieve these strategic moves, it is vital that an appropriate and viable redevelopment solution for the Tunnell Street site is achieved in order to realise the funds necessary to support the relocation of Jersey Gas and Kosangas (Jersey) to La Collette.

### **2. Redevelopment for Residential Use**

Jersey Gas supports the potential redevelopment of the Tunnell Street site for a primarily residential use. The site is well located in the centre of St Helier adjacent to all local services and amenities.

This represents a unique opportunity to support a key strategic aim of the Jersey Island Plan 2011, in providing high quality, sustainable modern homes, including family housing, in St Helier and by virtue of its size and location, the site can act as a major catalyst for the regeneration of the wider north of Town area.

### 3. Level of Parking Provision

It is important when considering the potential for a successful residential redevelopment of this key site, to understand both the planning policy context and the commercial viability of such a project.

The site is located in a highly accessible location, within close proximity of many offices and other places of work and as a result, we should expect to see a reduction in the need for private car usage, certainly in traditional commuting terms.

On the other hand, the 2011 Island Plan suggests that private parking is still a key requirement for residential development in St Helier. Access to private residential parking is also a key consideration for house purchasers in Jersey and it is therefore vitally important that the development brief provides sufficient flexibility to enable a balanced approach to the eventual level of private residential parking.

#### 4. Quantum of Development

The overall quantum of development identified in the North of Town Masterplan and set out in the development brief is, in our view, the minimum level commensurate with achieving a viable and sustainable re-use of this key town centre site.

Jersey Gas has made several submissions to the Minister which clearly define the very narrow commercial restrictions within which it can realistically consider releasing this site for redevelopment. Put simply, if the overall quantum of development does not achieve sufficient land value then any relocation of the gas company's operations is simply not financially viable.

That said, our client's firmly believe that if the Island's scarce resource of rural land is to be protected for future generations, it is incumbent upon all that we secure the most sustainable re-use of previously developed or brown field land within the existing built up area of town.

#### 5. Scale, Massing and Height

The site is surrounded by existing development of varied scale and mass and is directly adjacent to the Town Park. It also currently accommodates substantial structures such as the gas holder.

This combination of existing, often large scale structures and access to open space, together with the overall scale and urban character of the site presents a unique opportunity to develop a substantial, large scale residential development in the centre of St Helier with minimal impact on the character and setting of the existing historic town core.

Our client therefore fully supports the overall height envelope suggested and believes that a carefully designed and appropriately detailed development will enhance this part of the town centre.

#### 6. Public Parking Provision

As discussed in previous dialogue with the Department, our client remains concerned that the level of public parking provision sought as part of any redevelopment of the site places an unfair and potentially unviable burden of cost on the landowner.

The States took a decision to remove some 450 public parking spaces from the town park site on the assumption that these would be replaced elsewhere through redevelopment largely by private landowners.

Taken alongside the requirement for 12½% affordable housing, costs of remediation, infrastructure improvements and PfA contribution amongst others, the additional burden of providing 138 public parking spaces further reduces the commercial viability of any potential redevelopment and adds to the pressure on development quantum.

#### 7. Pedestrian Link to Belmont Road

Jersey Gas has been positive and constructive in its consideration of releasing the Belmont Road site as part of an overall redevelopment strategy for Tunnell Street. However, this will only be achieved as part of a wider viability appraisal for the project which takes account of the various other contributions being sought through the development brief from potential redevelopment.

#### 8. Public Realm Improvements

Jersey Gas considers that any public realm improvements should be considered as part of an overall package of measures that will achieve a viable and deliverable regeneration of this important site. It is very important that proper consideration is given to an appropriate package of contributions that will ensure a high quality, sustainable environment but one that can actually achieve the financial returns necessary to support the relocation of the gas company's operations.

#### 9. Architectural Character

The architecture of any proposed redevelopment of the site should take account of the character and context of the surrounding area. However, Jersey Gas believes that the issue is not one of architectural style or of design constraint but rather of creating a high quality development that will extend the urban grain of St Helier and establish an appropriate sense of place that will, in turn, offer a spacious, characterful, modern residential environment that is attractive to residents and adds to the overall visual quality and amenity of the town centre.

#### 10. Relocation of Associated Uses

In addition to the existing gas storage facilities and process equipment currently occupying the site, there are a number of other associated uses which remain critical to the gas company's operation, including the existing offices and showroom, sublet office premises, general workshop/storage facilities and unqualified staff accommodation, all of which would require to be relocated as part of any redevelopment proposals for the Tunnell Street site.

The relocation of these facilities and the significant logistical and operational disruption resulting will have substantial associated capital and revenue costs and it is therefore critical that the development brief takes full account of the implications for Jersey Gas of relocating its entire operation off-site.

#### 11. Archaeological Potential and Historic Buildings

Jersey Gas has engaged the services of Museum of London Archaeology (MOLA) to provide specialist input on the archaeological potential of the site. Whilst it is acknowledged that any archaeological assets within the site should be afforded adequate protection, it is also critical that

the development brief is sufficiently flexible to enable any associated impacts, such as reduced basement parking for example, to be accommodated. This is also true of any existing historic buildings located within the site.

Protecting or retaining such assets will have a direct bearing on the overall quantum of development that can be achieved and the associated land value. This must therefore be considered alongside the other planning gains sought as part of an overall package.

As you are aware, Jersey Gas is eager to continue to work with the States of Jersey to develop an appropriate strategy for the sustainable re-use of their Tunnell Street site. It is important though that this strategy takes full account of the company's requirement to maintain its business operations and the security of gas supply for the Island.

The final development brief must therefore have due regard to the commercial viability issues that will inform any decision about relocating the gas company's operations and enable the release of this important town centre site for redevelopment.

We trust that the Minister will give due regard to our client's submission in his final consideration of the development brief.

Yours sincerely

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cc

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