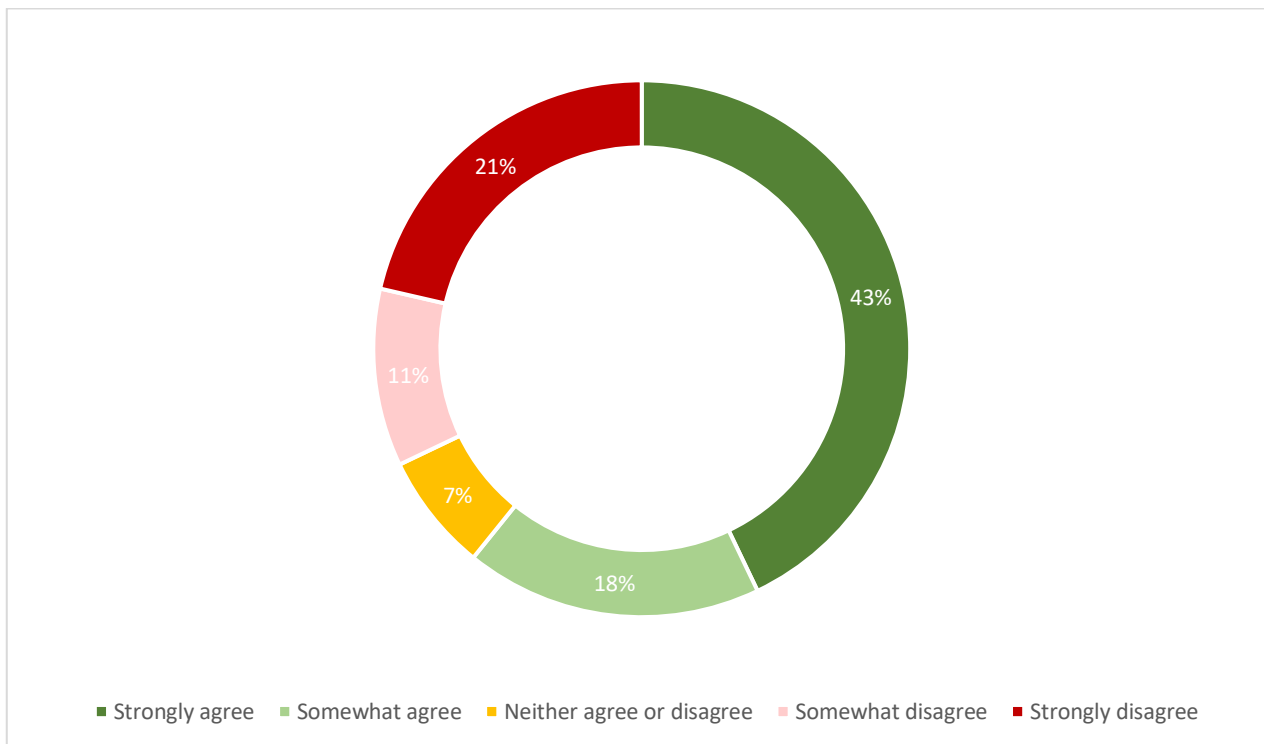


Parking standards: post consultation report

Consultation feedback and response

- The standards for the provision of parking space are over 30 years old and were designed to accommodate the car. The island’s transport policy has changed and now recognises that fewer motor vehicle journeys will be good for Jersey.

Please state whether you agree or disagree with the need to change residential parking standards?



Consultation feedback	Response
The arrival of new supplementary planning guidance for residential parking standards is welcomed.	Noted.
I welcome the action and intent, it has been too long to wait (from a long-established acceptance that the 1988 Standards are woefully inadequate for today’s decision-making context) to make progress on an issue that is of such relevance to the Island, particularly the carbon agenda.	Noted.
Jersey Electricity (JE) welcomes the consultation on the Draft Residential Parking Space Standards (March 2023).	Noted.
I agree that parking standards needs to be improved for residents. However, the suggestions you've made for parking would result in even more problems for residents particularly in town areas.	The revised draft standards relate to the level of parking provided on-site as part of new residential development. As the most accessible part of the island, where residents have easier access to goods and services locally and a range of travel choices, it is proposed that levels of residential car parking provision in association with residential development is relatively lower in the Town of St Helier than in other parts of the island.

Consultation feedback	Response
	<p>The revised draft standards do not preclude car ownership or car use. They set out levels of car parking required to support residential development in different parts of the island based on relative accessibility and the potential capacity of residential development proposed whilst also seeking to optimise the density of development (see: Consultation on draft planning guidance for the density of residential development (gov.je)); and improve the internal and external spaces of new homes (see: Draft supplementary planning guidance: residential space standards (gov.je)).</p>
<p>The parking requirements are actually too low NOT too high. This can easily be seen by visiting any housing estate on the Island after working hours and see the lack of available spaces and the vast number of cars crammed onto on-street parking where none was originally envisaged. Parking in town is also woefully lacking as can be seen by the town car parks being full even on a Sunday (Minden Place in particular).</p>	<p>The Sustainable Transport Policy (gov.je), which has been approved by the States Assembly, sets out a series of principles to guide the development of a sustainable transport system for Jersey, many of which are directly relevant to the planning system including the need to:</p> <ol style="list-style-type: none"> 1. recognise that fewer motor vehicle journeys will be good for Jersey 7. reduce the impact of vehicles on our landscape and create more space for people in St Helier 8. create planning systems that reduce the need to travel <p>The revised draft standards set out levels of car parking required to support residential development in different parts of the island based on relative accessibility and the potential capacity of residential development proposed whilst also seeking to optimise the density of development (see: Consultation on draft planning guidance for the density of residential development (gov.je)); and improve the internal and external spaces of new homes (see: Draft supplementary planning guidance: residential space standards (gov.je)).</p>
<p>In today's work people are busy and time is very much of the essence. You can have a view on whether the car's important or not but you don't have the right to impose your views on others.</p> <p>Time is what is important, and the ability to jump in your own vehicle, parked outside your own accommodation, is what matters.</p>	<p>See above.</p> <p>The duration of a journey in the island can fluctuate depending on the time of day and is greatly influenced by the location of the journey start and destination.</p> <p>The guidance does not preclude car ownership or use. Alternative shared transport options, such as car clubs can address the need of having a vehicle ready to go.</p> <p>The new guidance will also support the provision of cycle parking: travelling by bike, for some, can be faster and more efficient than a trip made by vehicle, especially in town.</p>
<p>I strongly agree the need to control development that ignores the needs of the residents that live in those dwellings. I believe it is motivated by profit and not the needs of people.</p> <p>The scope of this guidance is silent on the size of the problems caused by historic weaknesses in the policy. We need to see remediation for existing residents by ensuring</p>	<p>The revised draft standards set out levels of car parking required to support new residential development only.</p>

Consultation feedback	Response
<p>new car parking factors in the shortfall. I live on Clearview Street and when the fire station and cadets move on to La Collette, we need to see extra spaces for existing residents, IN ADDITION to the spaces for the flats that you are probably going to build.</p>	
<p>You have to think about how a person's life can change. Ok so it's ok, if the person is fit and healthy, but what if they become ill all of a sudden and can not work and need their car to get to the hospital & doctors for continuous appointments and the bus stop is not right outside their house and they struggle to even walk let alone be ok on a bus. How do they get things they need if someone else can't use a car to help them. What if a person has an elderly relative on the other side of the island and it takes 2 buses to get there, and there on the last months of their lives. Are you thinking about the people who will struggle. A car is essential when someone is really ill and unable to work to pay for taxis and take care of relative who suddenly became critically ill.</p>	<p>The revised draft standards do not preclude car ownership or car use. They set out levels of car parking required to support residential development in different parts of the island based on relative accessibility and the potential capacity of residential development proposed whilst also seeking to optimise the density of development (see: Consultation on draft planning guidance for the density of residential development (gov.je)); and improve the internal and external spaces of new homes (see: Draft supplementary planning guidance: residential space standards (gov.je)).</p> <p>The revised draft standards, at section 5.2, introduce a specific requirement for provision of car parking space to be made for people with disabilities.</p>
<p>The does not seem any future proofing of vehicles required for-</p> <ol style="list-style-type: none"> 1) singles who become parents-cycling en famille with tiny children not practical. 2) the care in the community which is being pushed by health-where will carers/visitors/family park? 3) people who become disabled in previously non-designated disabled accommodation-professionals visiting/carers/family? 	<p>Change</p> <p>The level of minimum car parking required for family homes (2-bed+) in the Town of St Helier and Les Quennevais will be enhanced in the revised guidance, to better meet the needs of families.</p> <p>The revised cycle parking standards require the provision of space for cargo-bikes in larger developments. These can provide a transport option for some families.</p> <p>The revised draft standards, at section 5.3, and 3C set out requirements for the minimum level of visitor car parking.</p> <p>At section 5.2, the revised draft standards introduce a specific requirement for the provision of car parking space to be made for people with disabilities.</p>
<p>Whilst the concept of fewer vehicles may be the goal, one has to consider the following:-</p> <ul style="list-style-type: none"> • 1)Families with children-needing shopping/to get to GP/chemist/activities/visiting family/friends etc • 2)Elderly/disabled requiring care in the community/GP visits/visiting family/friends to reduce loneliness/people running errands in their behalf 	<p>See above.</p>
<p>The policy is decremental to the elderly, those with young families, and the disabled. The elderly need access to transport to other than a bus service which may be a significant distance from their home. Taking two young babies to the proposed health centre at Quennevais by bus is not practicable. The disabled do not all live on bus routes. Furthermore the policies discriminate against those on lower incomes as they are the ones most likely to be affected by the change.</p>	<p>The revised draft standards are not considered to be discriminatory, but inclusive.</p> <p>At section 5.2, they introduce a specific requirement for the provision of car parking space to be made for people with disabilities.</p> <p>Change</p> <p>The level of minimum car parking required for family homes (2-bed+) in the Town of St Helier and Les</p>

Consultation feedback	Response
<p>Realistically these restrictions on lifestyle do not affect those that live in the countryside, and give them no incentive to reduce car use (other than to visit St Helier less).</p> <p>Some of these live in St Helier and need their car / van for work. This leads to the few car parks filling up with resident parking at night, reducing the attractiveness of St Helier as a venue to visit in the evening.</p>	<p>Quennevais will be enhanced in the revised guidance, to better meet the needs of families.</p> <p>The revised draft standards do not preclude car ownership or car use. They set out levels of car parking required to support residential development in different parts of the island based on relative accessibility and the potential capacity of residential development proposed whilst also seeking to optimise the density of development (see: Consultation on draft planning guidance for the density of residential development (gov.je)); and improve the internal and external spaces of new homes (see: Draft supplementary planning guidance: residential space standards (gov.je)).</p> <p>There is no differentiation about the use of public car parks for the parking of cars or vans, subject to width and height restrictions (which is at a maximum of 6'4" and 1.93m for Pier Road MSCP; and 6'6" and 1.98m for most other MSCPs; with none applying to surface level car parks). There is general availability of parking space overnight in St Helier's public car parks.</p>
<p>Whilst better active transport options now exist, readily accessible vehicle parking spaces provide islanders with the opportunity to obtain gainful employment and participate in community activities.</p> <p>Car parking spaces is often more than the price of a brand new car in Jersey.</p>	<p>The revised draft standards do not preclude car ownership or car use. They set out levels of car parking required to support residential development in different parts of the island based on relative accessibility and the potential capacity of residential development proposed whilst also seeking to optimise the density of development (see: Consultation on draft planning guidance for the density of residential development (gov.je)); and improve the internal and external spaces of new homes (see: Draft supplementary planning guidance: residential space standards (gov.je)).</p> <p>The revised draft standards set out requirements for developers to meet: in most cases, these are minimum standards and it will remain for the developer to decide whether more car parking provision should be made relative to the demand and affordability of the housing product that they are seeking to provide, which may or may not include access to a parking space.</p>
<p>I believe at one point Planning Dept insisted on one parking per household for each bedroom available in the building. I strongly believe this should be kept and instead upon for all development whether b-new or alterations to existing premises.</p>	<p>Planning guidance for the provision of car parking space in association with all forms of development has been in operation in Jersey since September 1988 and is set out in Parking (planning policy note) (gov.je). At this time, the transport strategy adopted by the States of Jersey might be described as one of 'car-accommodation' whereby policy sought to make optimal provision for the car.</p> <p>Since the mid-1990s, however, there has been a significant shift in the strategic policy framework for transport in the island. Successive sustainable transport policies have fundamentally altered the policy emphasis from car-accommodation to seeking to reduce the environmental impact of vehicular traffic and the promotion of other</p>

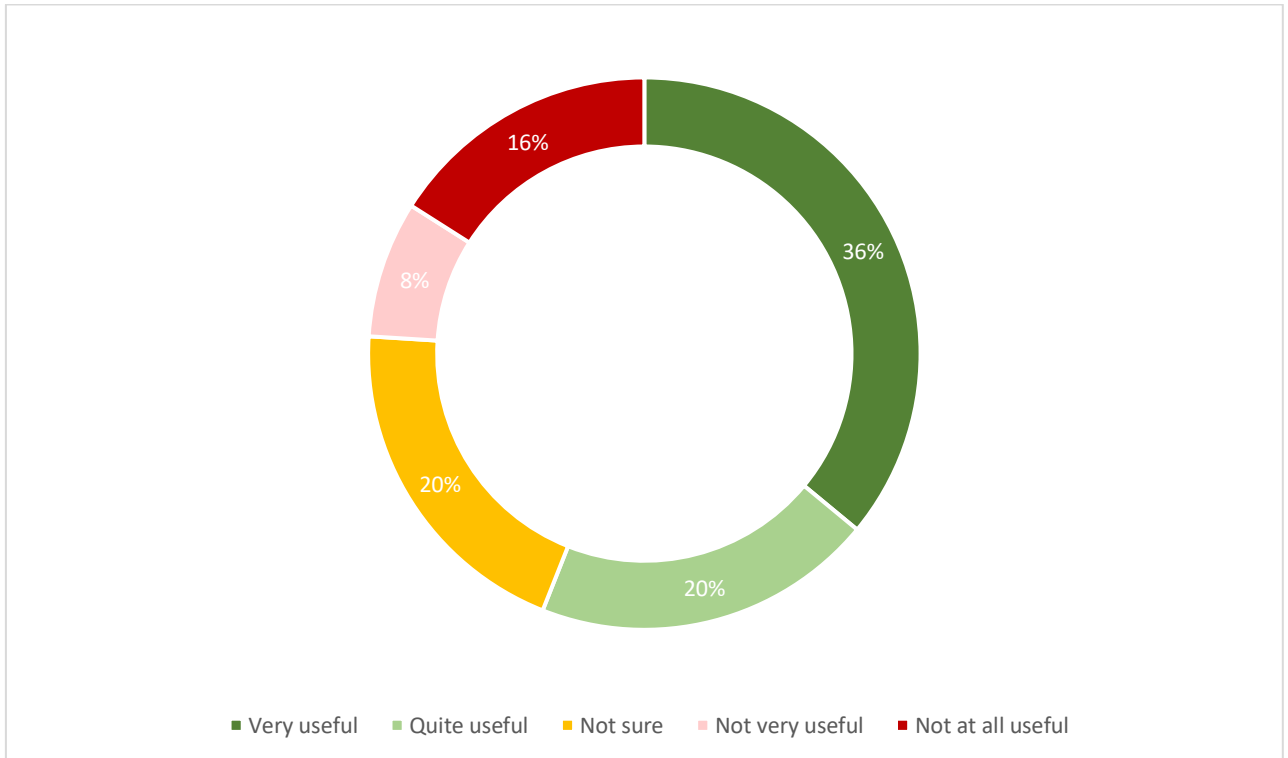
Consultation feedback	Response
	<p>more sustainable modes of travel, including walking, cycling and public transport.</p> <p>This presents discord between the policy direction set by the bridging Island Plan, which embodies the objectives of the current Sustainable Transport Policy, and the supplementary planning guidance that is designed to support and complement it.</p> <p>In light of this, there is considered to be an urgent need to review the guidance used to assess planning applications relative to the provision of space for parking, and it is against this background that these revised standards for residential development have been prepared.</p>
1 space at least per bedroom for each	See above.
Jersey has great potential to lead the way in sustainable transport	<p>The Sustainable Transport Policy was adopted in 2020. It looks at transport in the Island, including:</p> <ul style="list-style-type: none"> • active travel (walking and cycling) • public transport • road safety • parking • improving our the roads to support more sustainable ways of travelling • how we can use technology to help us decide how we travel <p>The second interim report on the sustainable transport policy outlines the progress made since we the STP was published.</p>
The island has an unhealthy obsession with the motor vehicle. This is now impacting the health and well-being of islanders more so than ever before. With each vehicle requiring 5-8 parking spaces (home, work, doctor, supermarket etc) every additional car takes up space of approx an average one-bed apartment. Change is needed to re chart our future path.	See above
<p>This needs to be fully investigated for Building Regulations as well as Planning Regulations.</p> <p>Thermal runaway from EV batteries in the event of a fire is a real concern yet no revisions to Building Regulations. EV charge units are being installed in garages, carports, fixed to sides of properties, within basements of multioccupancy properties.</p>	<p>Change</p> <p>Empirical evidence relating to electric vehicles (EVs) is evolving rapidly as the EV industry is comparatively young (around 12 years old) in comparison with the internal combustion engine vehicle (ICEV) industry (around 150 years).</p> <p>There are concerns over potential increases in fire severity, duration and frequency associated with the increased use of electric cars and vehicle charging equipment within car parking facilities. However, it remains uncertain whether the increase in electric vehicles and charging equipment will notably increase the fire risk and/or frequency.</p> <p>The emerging risk and increased use of electric vehicles and associated charging equipment has led to a need for guidance on management of the associated risks, but</p>

Consultation feedback	Response
	<p>consistent guidance, regulations and legislation are not yet in place.</p> <p>Changes will be made to the guidance to identify potential measures to mitigate risk related to EVCPs in covered parking spaces. Further work is required, outside the scope of this planning guidance, to consider whether change to building bye-laws is necessary.</p>

2. Section 3 of the draft guidance sets out issues of design that need to be considered for different forms of parking provision.

Section 3.3.1 sets out the design considerations for the provision of cycle parking; and section 3.3.2 deals with the provision of parking space for non-standard bikes.

How useful do you think this particular guidance is?



Consultation feedback	Response
As a cargo bike commuter, every day, parking is challenging and should be addressed to make it easier for people who are making this sustainable transport choice	The revised draft standards make provision for non-standard bikes.
Most people are unable to use a bicycle as their regular mode of transport. While it may be nice for cyclists to have more bicycle parking in town, that does not remove the need for parking for more common and needed modes of transport like cars/motorbikes - albeit not environmentally friendly, while we don't all have electric cars you can't simply make it more difficult for car drivers to park and force them to use shoppers parking/parking further away from home.	The revised draft standards set out levels of all forms of parking – including bike, motorcycle and car - required to support residential development in different parts of the island based on relative accessibility and the potential capacity of residential development proposed whilst also seeking to optimise the density of development (see: Consultation on draft planning guidance for the density of residential development (gov.je)); and improve the internal and external spaces of new homes (see: Draft supplementary planning guidance: residential space standards (gov.je)).
Common complaints about cycle parking are lack of security, lack of shelter and for those with E bikes some stands like those recently installed in Sand St are	Section 3.31. of the revised draft standards recognise that design of cycle parking is as important as the quantity and addresses issues of security and shelter; and defines acceptable forms of cycle parking designs.

Consultation feedback	Response
<p>typically not able to house E bikes which are often heavier and chunkier than standard cycles.</p> <p>Greater provision should be given to cargo bikes as it is very likely that more people will shift to cargo bikes in the future as seen in more bike friendly jurisdictions. Again, all cycle parking should be secure, indoors, CCTV recording.</p> <p>You should also provide sufficient space for people to maintain their bikes in situ, including possible basic maintenance stands and air pressure pumps as seen across France, Germany and the Netherlands.</p>	<p>Appendix 3A sets standards for the provision of non-standard bikes.</p> <p>The provision of space/facilities for bike maintenance is an issue related to travel planning and is not specifically related to planning guidance about parking standards.</p> <p>Under the auspices of Policy TT1 of the bridging Island Plan, development which has the potential to generate significant amounts of movement must be supported by a transport assessment and a travel plan. This will be required to demonstrate how a development proposal, in its design and long-term use, has responded to the sustainable transport principles and how it will promote and encourage more sustainable travel in the island.</p>
<p>Useful, but has no bearing whatsoever on my view that vehicles are needed. My whole life I haven't been interested in purchasing properties without parking, I buy good cars that I want to drive - both for enjoyment, here and away, and also for my day-to-day ease of moving around.</p> <p>What would be better for Jersey is people moving here being restricted, thus reducing vehicles on the roads. Until that is addressed, you can describe it however you want, but it doesn't take away the issue.</p>	<p>The Sustainable Transport Policy (gov.je), which has been approved by the States Assembly, sets out a series of principles to guide the development of a sustainable transport system for Jersey, many of which are directly relevant to the planning system including the need to:</p> <ol style="list-style-type: none"> 1. recognise that fewer motor vehicle journeys will be good for Jersey 7. reduce the impact of vehicles on our landscape and create more space for people in St Helier 8. create planning systems that reduce the need to travel <p>The revised draft standards set out levels of car parking required to support residential development in different parts of the island based on relative accessibility and the potential capacity of residential development proposed whilst also seeking to optimise the density of development (see: Consultation on draft planning guidance for the density of residential development (gov.je)); and improve the internal and external spaces of new homes (see: Draft supplementary planning guidance: residential space standards (gov.je)).</p>
<p>In my current new build block at Westmount, cycle parking facilities are overcrowded despite ample provision.</p> <p>However, many residents chose to store their bikes at the end of their own designated parking bays. This can be achieved by making joint cycle/parking bays with a facility to lock a bike included in the bay.</p>	<p>The current parking guidance has no specific requirement for the provision of cycle parking. The adoption of new minimum standards will ensure the provision of cycle parking facilities in all new residential development.</p> <p>The integration of cycle and vehicle parking does not offer the advantages that are available with a dedicated standalone cycle parking facility. These facilities may include enhanced security measures, protection from the elements, and/or easy access. The use of garages for cycle parking may be acceptable where it can be demonstrated both cycles and cars can be stored simultaneously.</p>
<p>EV whether car, bicycle or moped all have the potential for thermal runaway. A fire that generates its own oxygen and can't be extinguished by conventional fire fighting methods. Added to this are the gases that are released during an EV burn.</p>	<p>Change</p> <p>Empirical evidence relating to electric vehicles (EVs) is evolving rapidly as the EV industry is comparatively young (around 12 years old) in comparison with the internal combustion engine vehicle (ICEV) industry (around 150 years).</p>

Consultation feedback	Response
	<p>There are concerns over potential increases in fire severity, duration and frequency associated with the increased use of electric cars and vehicle charging equipment within car parking facilities. However, it remains uncertain whether the increase in electric vehicles and charging equipment will notably increase the fire risk and/or frequency.</p> <p>The emerging risk and increased use of electric vehicles and associated charging equipment has led to a need for guidance on management of the associated risks, but consistent guidance, regulations and legislation are not yet in place.</p> <p>Changes will be made to the guidance to identify potential measures to mitigate risk related to EVCPs in covered parking spaces.</p>
<p>It is extremely biased toward the able bodied adult and does not adequately consider the elderly, disabled, young (who need lifts).</p>	<p>At section 5.2, the revised draft standards introduce a specific requirement for the provision of car parking space to be made for people with disabilities.</p> <p>This guidance is required to be considered in association with policies set out in the bridging Island Plan. Policy TT1 – Integrated safe and inclusive travel states proposals will be supported where it can be demonstrated that consideration has been given to, and provision made for, the travel needs of children, elderly people and people with sensory or mobility impairments and other forms of disability, as a priority.</p>
<p>It does not account for the delivery drivers who need spaces nor the drivers who need to park their company vans and cars overnight.</p>	<p>At section 3 of the guidance, it explicitly states that in all forms of residential development, even those which might be in the town centre or 'car-free', consideration should be given to the provision of space for refuse collection, drop-off, emergency access and deliveries.</p> <p>There is no differentiation about the use of public car parks for the parking of cars or vans, subject to width and height restrictions (which is at a maximum of 6'4" and 1.93m for Pier Road MSCP; and 6'6" and 1.98m for most other MSCPs; with none applying to surface level car parks). There is general availability of parking space overnight in St Helier's public car parks.</p>
<p>There has always been a shortage of motorcycle parking.</p> <p>Persons owning expensive bicycles are hesitant to use public bike racks. Perhaps there should be premium parking spaces, where CCTV is in operation, available for those willing to pay.</p>	<p>The revised draft standards set out levels of motorcycle and cycle parking required to support residential development.</p> <p>They do not relate to the provision of public parking facilities.</p> <p>Work is, however, ongoing as part of the parking strategy to further explore utility pricing / differential pricing (as currently seen in Sand St MSCP).</p>
<p>3.1.1. Alternative sustainable transport measures: Electric shared transport, embraced and supported by the government, can contribute solutions to many of the parking issues identified in the draft supplementary planning guidance. JEVCo, trading as EVie, is a provider of shared mobility cars, vans, bikes and cargo bikes in the Channel Islands. Due to the small size of the</p>	<p>Noted.</p>

Consultation feedback	Response
<p>addressable market in Jersey, it is likely to remain the sole shared mobility operator in the medium term.</p> <p>JEVCo has approached the government to offer itself as a device to support the government's efforts to address some of the issues acknowledged in the planning guidance consultation, the carbon neutral roadmap and the STP.</p>	
<p>3.1.1. Alternative sustainable transport measures: "Car clubs are most appropriate when paired with wider incentives"</p> <p>We agree. From experience, we know wider initiatives to encourage shared mobility schemes are a powerful catalyst to their success. Examples of potentially helpful initiatives:</p> <ol style="list-style-type: none"> 1. Car free travel days in STZs: (where all (ICE?) vehicles are prohibited from entering an STZ to encourage greater take up of alternative travel (eg. bus/ bikes/ electric cars) 2. Reduced or zero rated import duties/GST on electric vehicles (cars,vans and bikes). 3. GoJ Subsidies towards shared transport club membership <p>GoJ recently provided the second round of subsidised vouchers for the purchase of ebikes. The ebike subsidy is not a progressive form of subsidy as it is only attractive to those who can already afford £2k+ for the balance of the purchase cost.</p> <p>GoJ should consider extending, or even redirecting, support to include shared transport club membership. This would bring availability of sustainable electric transport within reach of everyone on the island (progressive support), "ensure equitable access for all users" and encourage mass conversion from private ownership to shared electric transport.</p> <p>Because EVie already exists, supporting Jersey residents with membership subsidies would provide GoJ with a "Fast Start" initiative as outlined in its STP. JEVCo has already made proposals directly to ministers, including the Environment, I&E and Climate Change, on how this could work which should be considered in conjunction with the government's ambition as declared in "10. Sustainable funding for transport" in The STP.</p> <ol style="list-style-type: none"> 4. Extend the free/subsidised parking of newly registered electric vehicles to include drivers of commercial electric vehicles (including car clubs) in public car parks. Currently only privately owned vehicles are eligible for the subsidy. <p>It is important for the government to stimulate the migration of commercial fleets and sole traders from</p>	<p>Noted.</p>

Consultation feedback	Response
<p>heavily polluting Internal combustion engine (ICE) vans and trucks to electric.</p> <p>Electric vans are relatively expensive compared with ICE vehicles. To ease the business case and encourage migration to electric commercial vehicles government should consider:</p> <ul style="list-style-type: none"> ● Subsidised parking in public parking and ● Free/subsidised access to supercharger Electric Vehicle Charging Point (EVCP) networks. e.g.: EVie is working with SoJDC to encourage it to install a series of superchargers in Phase 1. of the 1,100 unit South West St Helier development to encourage logistics/deliveries to migrate to electric and help SoJDC meet its carbon neutral targets. <p>Consideration may also be given to wider policy disincentives:</p> <ol style="list-style-type: none"> 5. Increase price of ICE public parking in STZs; 6. Implementation of island-wide ICE vehicle mileage tax as proposed in Guernsey. 	
<p>Andium partnership - Shared Transport Hubs. Through a Master Agreement with Andium, JEVCo has access to up to 1,000 publicly accessible parking spaces - all of which will be supported with EVCPs - on which to develop Shared Transport Hubs (see below).</p> <p>These 1,000 car parking spaces are existing under-used parking spaces typically in high density residential STZs. The excess car park spaces result from previous planning guidance which required Andium to build parking at ~1:0.7. Social housing residents use significantly less parking/unit than others.</p> <p>JEVCo and Andium's partnership is designed to "sweat" these existing void assets by converting them to Shared Transport Hubs. Better use of this existing space can, in conjunction with POAs (see below) for new build projects, result in far fewer new parking spaces having to be built. Why build more, (especially in STZs) if they already exist in suitable locations?</p> <p>Shared transport, including car clubs and shared electric bicycles are most effectively deployed en masse, in Shared Transport Hubs located strategically in STZs within 3-4 minutes walk of the largest number of all residents.</p> <p>Current JEVCo/Andium Approach:</p> <ul style="list-style-type: none"> ● Identify Hub sites located within a 3-4 minute walk of the most densely populated locations. ● Focus on matching the government's approach to STZ prioritisation: St Helier Town Center, St Helier, Les Quennevais. 	<p>Change</p> <p>POAs need to be necessary to make the development acceptable in planning terms, meeting the objectives of the Island Plan; directly related to the development; and fairly and reasonably related in scale and kind to the development.</p> <p>Bridging Island Plan Policy TT4 clearly states that to encourage a shift to more sustainable modes of transport, support may be given for development that does not meet adopted minimum standards, where contributions towards alternative parking elsewhere, or sustainable transport infrastructure or services, is secured. Any such contribution would need to be secured through a planning obligation agreement.</p> <p>The guidance further supports this by stating that: planning obligation agreements (POAs) may be similarly used to secure the direct provision of [and/or funding for] additional parking infrastructure, facilities or services that will be required as a result of development.</p> <p>In such circumstances, therefore, POAs might be used to give the residents of a new development access to shared mobility transport options, which could be at a shared transport hub.</p> <p>The guidance will be amended to give greater emphasis to shared transport options and to acknowledge that this provision might be off-site. There would be a need, however, to demonstrate that the provision of any such facility was accessible and easy to use for residents in terms of the proximity of the facility and the availability of vehicles that might be used by residents of that development.</p>

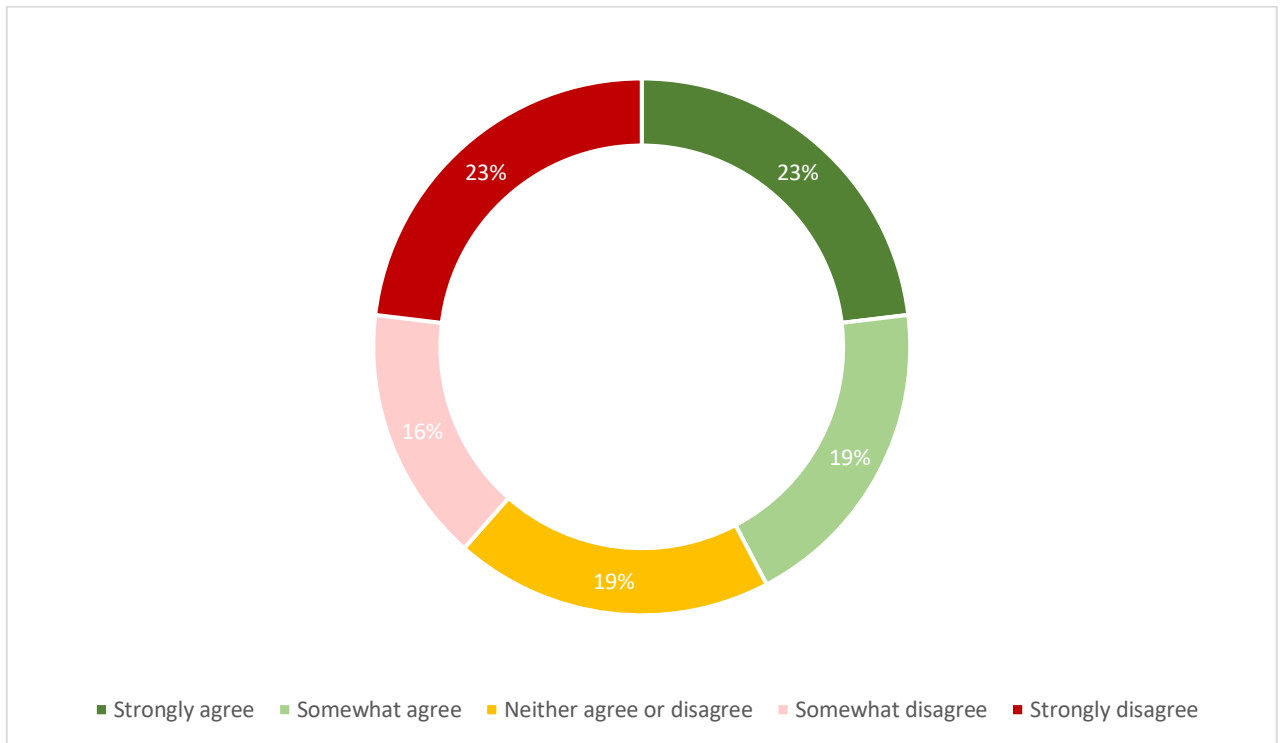
Consultation feedback	Response
<ul style="list-style-type: none"> • Provide a higher density of, and better access to, shared vehicles (Car/Van/Bike/Cargo/Moped) fleet. By making shared cars available at higher density in Hubs more people have a better chance of being able to find an available free vehicle. • Deploy covered/lockable bike and cargo bike hubs alongside cars and vans. <p>Shared Transport Hubs</p>  <p>What are they, what purpose do they serve and why are they a good thing? Mobility hubs bring together shared transport with public transport and active travel in spaces designed to improve the public realm for all.</p> <p>The concept is widely applied in many European and North American cities and increasingly spreading in the UK.</p> <p>Support densification of sites They provide an impetus for change in reducing parking provision, creating high density development and changing driving habits. Property developer contributions can be used to fund mobility hubs.</p> <p>Smarter sustainable transport planning</p> <p>Mobility hubs reclaim space for sustainable and equitable modes, reducing the dominance of the private car and its associated problems of congestion, carbon emissions, air quality and social exclusion.</p> <p>Convenience</p> <p>They boost convenience for multi-modal trips, with the possibility of seamless switches and improved links between different layers of transport.</p> <p>Plugging gaps in the public transport network:</p> <p>They can perform a sustainable 'first or last mile' connection in a cost effective way. They can provide flexible 24 hour services as a sustainable, accessible, alternative to private car ownership.</p> <p>Raising profile</p> <p>They raise the profile and visibility of the range of shared and other sustainable travel modes, which provides a new status and appeal, with the associated benefits of reduction in car use.</p>	

Consultation feedback	Response
<p>Improving public realm They allow space to be reorganised for the benefit of pedestrians, cyclists and business owners, addressing parking problems and creating a more pleasant urban realm. Converting space previously used only for private parking to green space, waiting areas and additional facilities makes for a better experience for the traveller, increasing patronage.</p> <p>Managing shared transport services They help to solve issues of “street clutter” from dockless/free floating micromobility services and provide a natural home for EV charging infrastructure.</p> <p>Mobility hub evidence CoMoUK has gathered the most insightful evidence it is aware of into a document. It covers five locations: Amsterdam; Bergen; Bremen; Vienna in Europe and Austin in the US. Please read CoMoUK’s Collection of mobility hub evidence and see where Hubs have been deployed in the UK here.</p>	

- Section 4 of the draft guidance sets out why different parts of the island are considered to be more accessible than others.

This assessment has been used to define five different sustainable transport zones (STZs); and to set different residential parking standards in each zone.

Please state whether you agree or disagree with the definition of sustainable transport zones, as set out in section 4 of the draft guidance and illustrated on figure 1.



Consultation feedback	Response
Villages such as St Aubin are highly desirable locations to live in and many households already choose not to use a car from these areas. In developing new homes, it's essential that precious land in these areas isn't taken up by parking spaces that residents don't need or want.	The revised draft standards set out levels of car parking required to support residential development in different parts of the island based on relative accessibility and the potential capacity of residential development proposed whilst also seeking to optimise the density of development (see: Consultation on draft planning guidance for the density of residential development (gov.je)); and improve the internal and external spaces of new homes (see: Draft supplementary planning guidance: residential space standards (gov.je)).
I think St Helier/town has been painted to look a lot more accessible than it really is. Yes, it is accessible to get into town, however, driving into town and trying to find parking is very difficult. Cycling into town isn't an option if people are shopping/going out for dinner etc. The bus route is good but it can be expensive especially for a family return, and it seems better value for money to drive with the car.	The revised draft standards set out levels of car parking required to support residential development in different parts of the island: they are not related to the provision of public parking spaces. The revised draft standards do not preclude car ownership or car use by residents of town and, for the most part, set out minimum levels of provision that should be met as an integral part of new residential development.

Consultation feedback	Response
Residents in town wanting to go visit more obscure parts of the Island can also have difficulties doing this without a car.	
Les Quennevais should not be limped in with St Helier, at the moment they are fundamentally different places. For example, to get from Les Q. to St Peter, St Ouen, St Mary, St John and upland St Lawrence, you need to travel into Town or do an exchange at a bad-quality bus interchange. Unless there are real plans for direct bus links from Les Q to these areas, it is not reasonable to restrict car parking in Les Q any more than other areas.	<p>The revised draft standards for car parking provision for St Helier and Les Quennevais are not the same, with greater minimum levels of car parking required to be provided in Les Quennevais (see appendix 3C).</p> <p>To enable and encourage people to use the bus instead of their own vehicle additional services across the island to support the choice to switch to public transport are being explored. Five trials have already started and work is ongoing to identify opportunities where better provision of buses can be realised to enhance the service on new or existing routes.</p> <p>This work forms part of the Bus development plan that is being progressed as part of the Sustainable transport policy.</p>
The two areas are often where the poorest islanders live and parking spaces are at the most expensive. Lack of parking spaces will prevent islanders living in these areas from accessing job opportunities and community activities that aren't located within walking distance.	<p>The most deprived islanders tend to be focused in St Helier (see: R Census 2021 Indicators of Deprivation Report 20221213 SJ.pdf (gov.je)), where nearly a third (30%) of households did not have a car / van at the 2021 census.</p> <p>It is considered that St Helier benefits from most transport choice for those without access to a car.</p> <p>The revised draft standards do not preclude car ownership or car use. They set out levels of car parking required to support residential development in different parts of the island based on relative accessibility and the potential capacity of residential development proposed whilst also seeking to optimise the density of development (see: Consultation on draft planning guidance for the density of residential development (gov.je)); and improve the internal and external spaces of new homes (see: Draft supplementary planning guidance: residential space standards (gov.je)).</p>
This is effectively discriminating against those who cannot afford and existing house by removing their ability to own a vehicle or to have a job that demands they have possession of a vehicle overnight.	<p>The revised draft standards do not preclude car ownership or car use.</p> <p>There is no differentiation about the use of public car parks for the parking of cars or vans, subject to width and height restrictions (which is at a maximum of 6'4" and 1.93m for Pier Road MSCP; and 6'6" and 1.98m for most other MSCPs; with none applying to surface level car parks). There is general availability of parking space overnight in St Helier's public car parks.</p>
<p>In the real world the elderly need transport that allows them to visit the whole Island, not just places or people living on bus routes.</p> <p>In the real world many tradesmen need a car for their work, and can only afford to live in residential areas.</p>	<p>The States Assembly has approved the Sustainable Transport Policy (gov.je), which seeks to respond to the real world implications of climate change. The planning system is required to contribute and the development of revised parking standards is part of this.</p>

Consultation feedback	Response
<p>In the real world shoppers will increasingly use the internet to purchase good rather than visit a increasingly inaccessible St Helier. Look at the number of empty shops, a trend that will increase due to unrealistic aspirations.</p>	<p>At section 5.2, the revised draft standards introduce a specific requirement for the provision of car parking space to be made for people with disabilities. These requirements are designed to help those with mobility issues, including the elderly. The existing guidance does not contain any such provision to be made.</p> <p>There is no differentiation about the use of public car parks for the parking of cars or vans, subject to width and height restrictions (which is at a maximum of 6'4" and 1.93m for Pier Road MSCP; and 6'6" and 1.98m for most other MSCPs; with none applying to surface level car parks). There is general availability of parking space overnight in St Helier's public car parks.</p> <p>The revised draft standards relate to the level of parking provided on-site as part of new residential development only and do not relate to the provision of public parking space provided in town.</p>
<p>We need to see safe links across the islands for push bike users and families. It is dangerous not to use a car in many parts of the island because of the lack of provision of adequate paths.</p> <p>We all love a potato, and I am sure wealthy land owners love the buffer between them and the rest of us, but we need to be more inclusive and prioritise safe corridors</p>	<p>As part of the work being undertaken in support of the Sustainable transport policy, strategic corridors for cycling across the island have been identified and audited using best practice route selection tools to ensure a consistency of approach.</p> <p>Investment is to be made in this infrastructure to create an island-wide strategic cycling and walking network.</p>
<p>Common sense must be used. I as a multi-vehicle owner know there are areas for vehicles and areas that are not suitable. You will always get the few who will push this - why penalise everyone? Deal with the few.</p>	<p>Noted.</p>
<p>We live on a 9x5 island. The gradient of which is actually quite low. >50% of islanders live within 3 miles of St Helier with a gradient less than 30m.</p> <p>We should have much larger sustainable transport zones and this should be married up with a more comprehensive all year round bus route. You could also look to include schools and their catchments within these sustainable zones.</p>	<p>Ease of access to and choice about how we might get to the places that we need to go differs across the island.</p> <p>Accessibility is influenced by a range of factors such as what the journey is for; how far we need to travel; the availability of safe walking and cycling routes; the proximity of bus routes, stops and the frequency and extent of the bus service; access to a car and the availability of parking at either end of a journey.</p> <p>Reflecting differing accessibility levels, this revised guidance divides the island into six zones - sustainable transport zones (STZs) - for the purpose of assessing parking needs.</p> <p>The definition and extent of these zones will be kept under review and altered in response to changing levels of accessibility brought about by, for example, the provision of new cycle routes or new or enhanced bus services.</p>
<p>Outside the Town Centre, the principle of the STZs is accepted. However, the application of the idea is not sufficiently sophisticated, and needs a finer grain so as to be applied with more subtlety.</p>	<p>Change</p> <p>Whilst the substance of this comment is acknowledged, it fails to recognise that the revised standards provide a much changed and refined distinction of accessibility (and relative levels of parking provision) across the island than</p>

Consultation feedback	Response
<p>Within the Town area for example some locations are far less accessible than others, in that they are further from a regular bus route, or are less likely to be accessed on foot or on a bicycle due to distance, topography or the lack of safe and lit roads and footpaths.</p> <p>Some of the boundaries appear illogical. For example, bus services to the top of Queens Road are no better than those to Longueville or Five Oaks, and arguably, due to the steep climb up Queens Road from the town centre, the top of Queens Road is less accessible than these other areas. However, Queens Road is in the Town and Les Quennevais STZ, as is La Moye which has fewer local facilities than Longueville and Five Oaks. Longueville and Five Oaks however, are within the Other Areas STZ, the same as all of the rural areas of the island. This is illogical. In the next section we propose a more graduated approach.</p> <p>Similarly, village centres, which offer a range of facilities within walking distance, and are served by a bus service, are seen as no more accessible than outlying areas, which have neither.</p> <p>As a result of the broad STZ areas noted above, the variation in the number of spaces required can also appear difficult to accept. For example a 3 bedroom house at First Tower would require only 0.25 of a car parking space, yet the same house in Longueville will require 2 spaces – 8 times the amount overall.</p> <p>As noted above, in our view some parts of the Town and Les Quennevais STZ are less accessible than others, and so the area should be subdivided. In the less accessible parts, a higher parking standard should be applied, at least 0.5 spaces per unit.</p> <p>At the same time there should be a more gradual transition between the Town and Les Quennevais STZ and the Other Areas STZ, in areas like Longueville and Five Oaks, where 1 space per unit may be appropriate.</p>	<p>the current guidance, which effectively only differentiates between areas within the St Helier’s ring road and the rest of the island.</p> <p>The draft guidance will, however, be revised to provide more granularity in the definition of STZs. This will be achieved by the addition of another zone – STZ5 – to provide another set of parking standards for other local centres and smaller settlements where some or most of people’s daily needs can be met within a short walk or cycle, and where a bus service is available, but its extent and frequency is currently relatively limited.</p> <p>STZ5 embraces those built-up areas, as defined in the bridging Island Plan as local centres including Bagot-Longueville; Five Oaks; Grands Vaux, Trinity Hill; Maufant; Sion; St Brelade’s Bay; and the parish centres of St Peter’s village; St Ouen’s village; St Mary’s village; St John’s village; St Lawrence Church; and St Martin’s village.</p> <p>There will always be situations where guidance will need to be applied pragmatically and where applicants can provide a sufficient justification for varying levels of provision relative to the specific circumstances of a site.</p> <p>In terms of specifics;</p> <p>It is considered appropriate to retain La Moye within Les Quennevais STZ. The area of La Moye is served by a range of local facilities, including shopping facilities; a primary school; and a country park within 800m or 20 minutes walk¹. Whilst the bus service serving this part of the Les Quennevais is not as frequent as that at Red Houses or along La Route des Quennevais, it is still relatively high (at 4-5 buses per hour); and there is also excellent pedestrian access to the wider range of facilities at Les Quennevais along the Railway Walk.</p> <p>It is similarly considered appropriate to retain the area of La Pouquelaye/ Mont à L’Abbé within the Town STZ on the basis of the range of local facilities available to residents here within 20 minutes walk or cycle, including local shopping and schools.</p> <p>Five Oaks and Longueville, along with a number of parish centres, are redefined within STZ5 (see above).</p>
<p>Section 4 describes the different ‘Zones’, most of which follow a boundary consistent with a designation in the Island Plan, however, this does not seem to be the case for the “Accessible Local Centres” but no explanation is offered, and this needs to be clarified. Some areas that are</p>	<p>See above.</p>

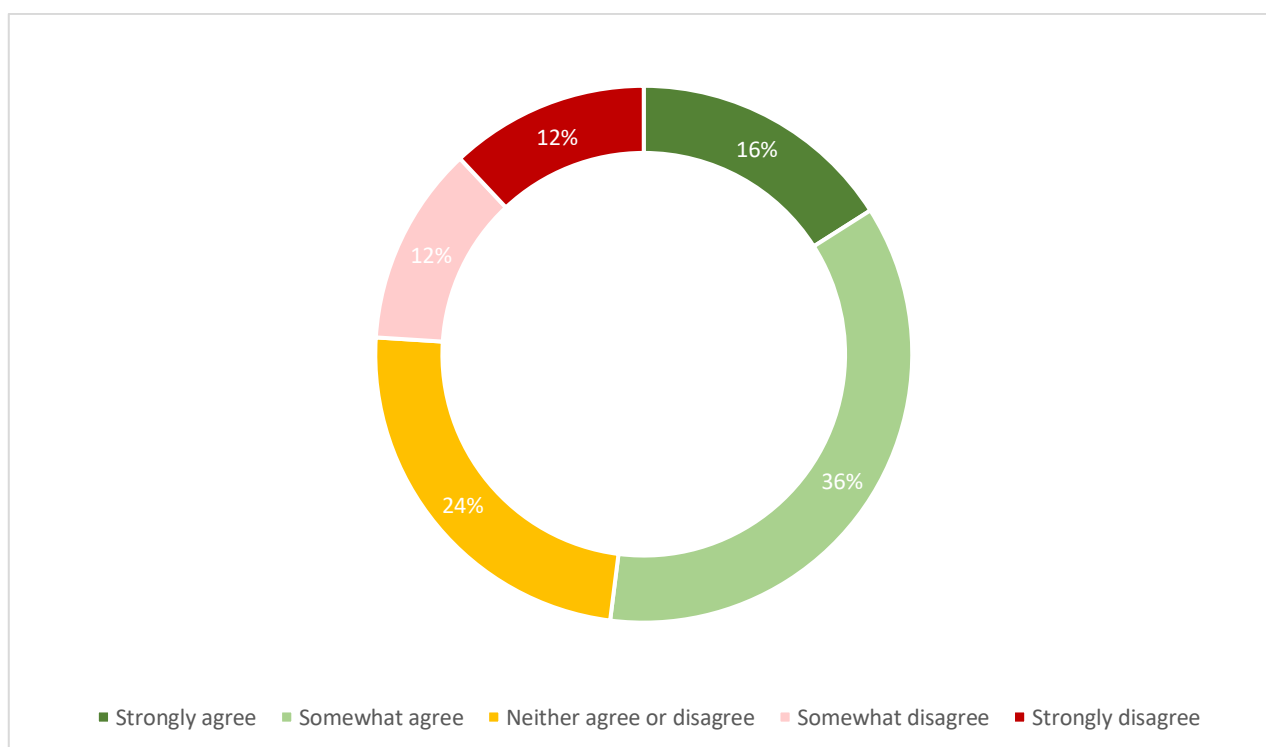
¹ Why 20 minutes? Research undertaken in Australia shows that 20 minutes is the maximum time that people there are willing to walk to meet their daily needs, with Melbourne adopting the position that the 20-minute journey represents an 800 metre walk from home to a destination, and back again (10 minutes each way) (see: https://www.tcpa.org.uk/wp-content/uploads/2021/11/final_20mnguide-compressed.pdf)

Consultation feedback	Response
not included seem to have excellent access to schools, shops and other services (Plat Douet for example).	
<p>Some of the material within the draft SPG is not adequate for the intended purposes, with specific reference to the map included as Figure 1, which should be at a much large scale and on a base map that enables the boundaries to be clearly understood with reference to features on the ground.</p> <p>The draft indicates that this will (eventually) be provided on a GIS layer, but this really should be issued with the draft document so that the public can understand site-by-site implications. The boundaries follow (in the main) existing Island Plan designations, but this is not always the case. Anyone commenting should be able to see this basic level of information as relevant to the application of the guidance.</p>	<p>This is not accepted.</p> <p>Section 4 provides very clear descriptions of the proposed STZs which are explicitly described relative to the definitions of built-up area boundaries on the existing bridging Island Plan, which are accessible and easily interrogated through the interactive online GIS mapping tool.</p>

5. Section 5 of the draft guidance sets out the approach to the provision of parking space for different types of residential development.

It is proposed that the need for parking space at age-restricted homes (e.g. for people over-55) and sheltered housing is treated in the same way as for other forms of residential development. It is recognised that, for sheltered accommodation, there may be less requirement for resident parking, but more visitor parking, with the overall amount of parking space staying the same.

Please state whether you agree or disagree with the proposed approach to the provision of parking space at age-restricted homes (and sheltered housing as set out in section 5.1.1 of the draft guidance).



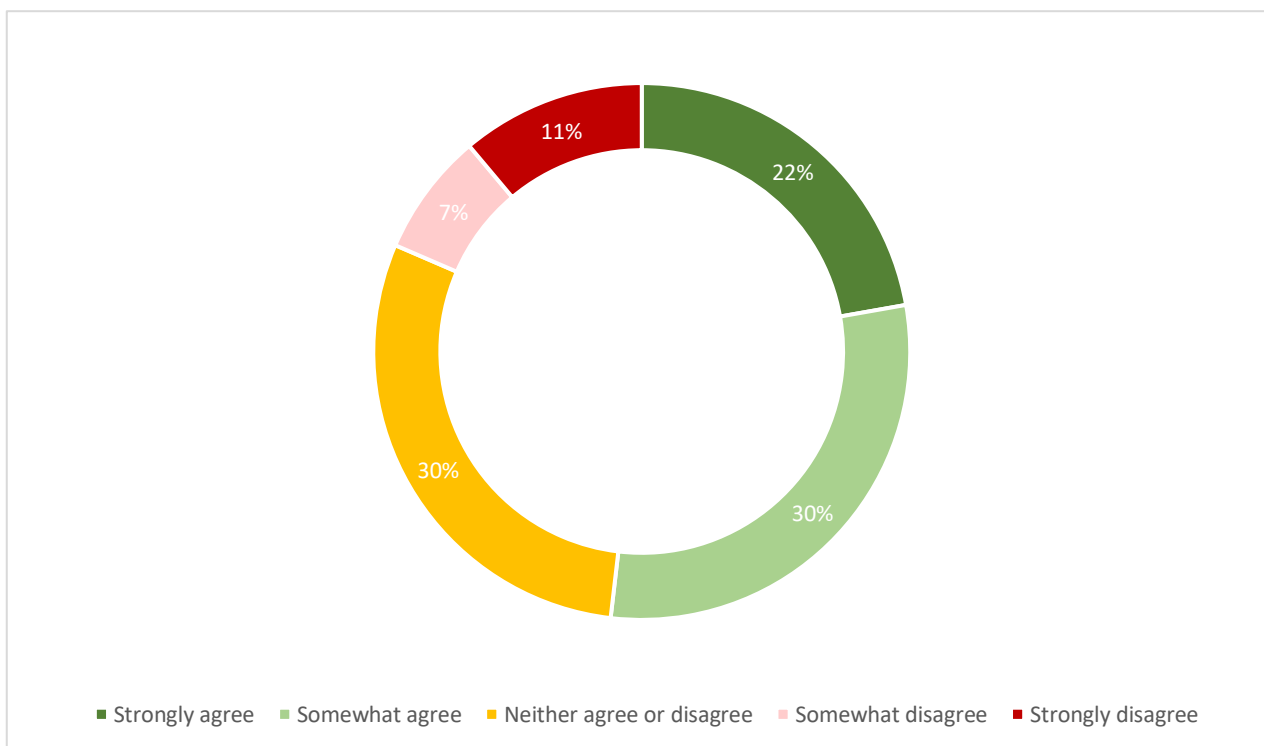
Consultation feedback	Response
<p>You need to have a resident space per property and a number of visitor spaces.</p>	<p>Planning guidance for the provision of car parking space in association with all forms of development has been in operation in Jersey since September 1988 and is set out in Parking (planning policy note) (gov.je). At this time, the transport strategy adopted by the States of Jersey might be described as one of 'car-accommodation' whereby policy sought to make optimal provision for the car.</p> <p>Since the mid-1990s, however, there has been a significant shift in the strategic policy framework for transport in the island. Successive Sustainable Transport Policies have fundamentally altered the policy emphasis from car-accommodation to seeking to reduce the environmental impact of vehicular traffic and the promotion of other more sustainable modes of travel, including walking, cycling and public transport.</p>

Consultation feedback	Response
	<p>This presents discord between the policy direction set by the bridging Island Plan, which embodies the objectives of the current Sustainable Transport Policy, and the supplementary planning guidance that is designed to support and complement it.</p> <p>In light of this, there is considered to be an urgent need to review the guidance used to assess planning applications relative to the provision of space for parking, and it is against this background that these revised standards for residential development have been prepared, where the level of car parking space provided is proposed to be reduced.</p>
<p>I should adopt a minimum of one home, one car space policy, but allow for additional parking for some people with young children or disabilities. Adequate visitor spaces also sensible.</p> <p>To make the point again- you need to address the backlog of inadequate parking also, not just new builds.</p>	<p>See above.</p> <p>The revised draft standards set out levels of car parking required to support new residential development only.</p>
<p>When you reach 55 you don't suddenly stop wanting to visit friends and places nowhere near a bus route. You don't suddenly want to take what could be a very long walk to the bus station in pouring rain or freezing weather. It seems a very selfish and ageist approach. But why should I care - I live in a glorious house on the beach with plenty of parking.</p> <p>These policies dichromate and probably go against basic human rights. The slow closure of St Helier as a commercial centre is happening before our eyes. This policy will just accerate its death.</p>	<p>The guidance proposes to treat the parking requirements for over-55 homes in the same way as other forms of residential development (unlike the existing guidance). It is not discriminatory or ageist: it is inclusive.</p> <p>The revised draft standards set out levels of car parking required to support new residential development only: they do not relate to the level of public car parking that might be required to support the retail function of town.</p>
<p>There are certain demographics / periods of life where parking is more necessary.</p> <p>Young children, aging adults, disability etc.</p>	<p>Noted.</p>
<p>The amount of parking is relative.</p>	<p>Noted.</p>
<p>In addition, increasingly many residents are less physically able, and there is clear evidence of growing demand for mobility scooters, but these only get a brief mention on page 12, and in relation to specialist housing.</p>	<p>The guidance makes explicit reference to the need to ensure that new development that is likely to cater for those making use of a mobility scooter, such as sheltered homes, will be expected to make provision for storage areas and charging points on the ground floor.</p> <p>At section 5.2, the revised draft standards introduce a specific requirement for the provision of car parking space to be made for people with disabilities.</p> <p>This guidance is required to be considered in association with policies set out in the bridging Island Plan. Policy TT1 – Integrated safe and inclusive travel states proposals will be supported where it can be demonstrated that consideration has been given to, and provision made for. the travel needs of children, elderly people and people</p>

Consultation feedback	Response
	with sensory or mobility impairments and other forms of disability, as a priority.
<p>Age-restricted homes (e.g. for people over-55) and sheltered housing</p> <p>We would suggest that the cycle parking standards are commensurate with the type of tenure.</p>	<p>The draft guidance acknowledges that there could be flexibility in the level of cycle parking required for development proposals for sheltered accommodation that seek to provide levels of parking which vary from the adopted standards, for bikes (and cars), where it can be supported with appropriate justification. It is, however, evident that the increasing use of e-bikes can support people with physical constraints to continue cycling.²</p>

² [Full article: Who uses e-bikes in the UK and why? \(tandfonline.com\)](https://www.tandfonline.com)

6. Please state whether you agree or disagree that ten per cent of residential car parking spaces should be allocated for use by people with disabilities. as set out in section 5.1.2 of the draft guidance.



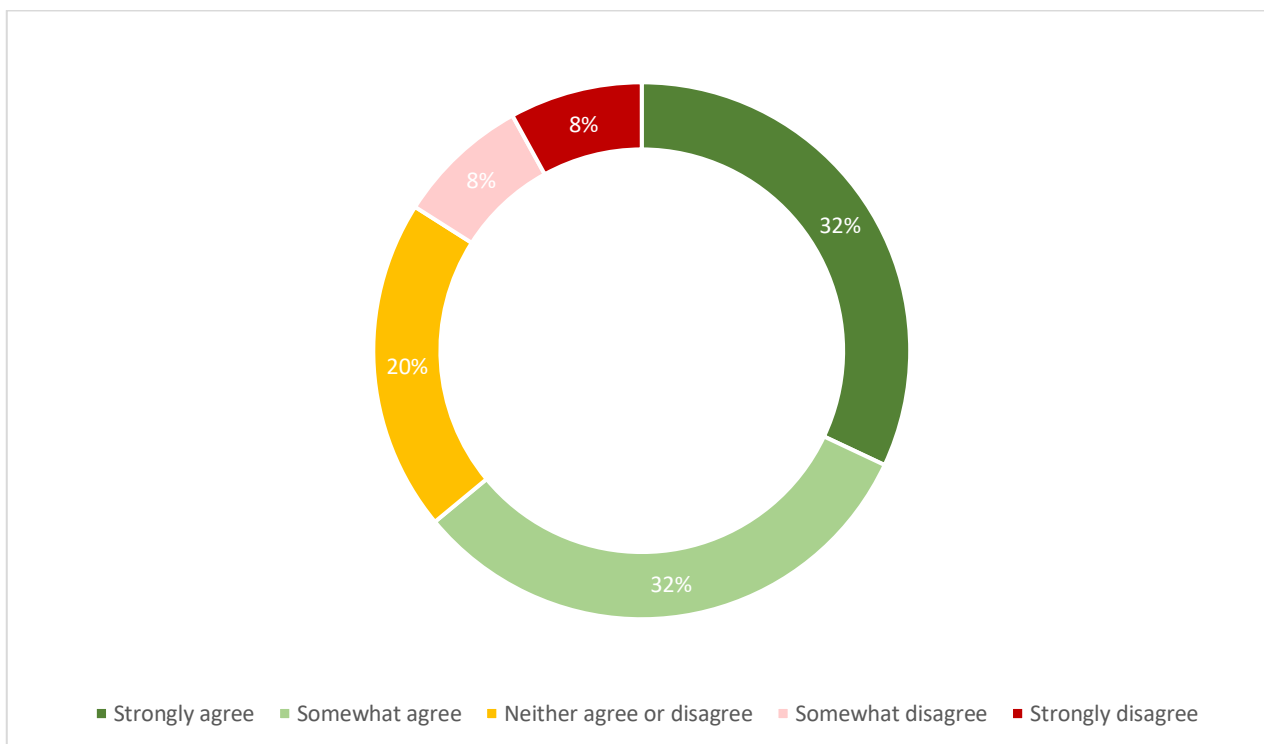
Consultation feedback	Response
I don't have enough insight into how much of these spaces are used by people with disabilities, and how many people there are with disabilities who need parking, but I often see these spaces empty when I'm struggling to find a parking space.	Noted.
Yes agree, but what about people with a sudden change of life and stuck because they can not work they are ill, but not classified as disabled.	At section 5.2, the revised draft standards introduce a specific requirement for the provision of car parking space to be made for people with disabilities.
People with cars, whether also with disabilities or not, should be treated the same. First come, first served, though there should, yes, be a few spaces reserved for the disabled.	This guidance is required to be considered in association with policies set out in the bridging Island Plan. Policy TT1 – Integrated safe and inclusive travel states proposals will be supported where it can be demonstrated that consideration has been given to, and provision made for. the travel needs of children, elderly people and people with sensory or mobility impairments and other forms of disability, as a priority.
We need to make it easy for people with needs to park safely	See above.
10% of spaces should be designed for disabled drivers and prioritised for them, but they shouldn't be allocated for use by people with disabilities. Also this only makes sense for homes without at least a 1:1 parking ratio.	See above.

Consultation feedback	Response
10% seems very high.	<p>See above.</p> <p>People have a disability if they have a physical or mental impairment, and that impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. These persons include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs.</p> <p>The 2021 Census³ results record that 21% of all island residents have a longstanding physical or mental health condition or illness; 15% of the island's population have an activity-limiting health condition or illness; and one in twenty residents (5%) reported that their activities were limited a lot.</p>
Seems about reasonable, however we as an island need to be careful what we start categorising as a disability. We have seen "disability" rates in other jurisdictions such as the US and the UK including obese and morbidly obese individuals. If Jersey pursued a similar line, then that 10% will be too low. However as it stands 10% seems about right.	See above.
Ten percent of what? The proposed spaces are wholly ridiculous and need to be at least increased to the current recommendations and hopefully increased.	See above.
How has this 10% figure been calculated? Again no future proofing. Some people are temporarily disabled-e.g. waiting for a hip/knee operation-others more permanently.	See above.
I would be interested to know whee the 10% figure comes from. Are 10% of all drivers in Jersey disabled?	See above.
At 5.2 there is a requirement for 10% of residential parking spaces to be accessible for people with disabilities. There is no indication as to when this requirement might apply (is it only at the 10th space when it is required?) This should synchronise with other regulatory requirements, such as the Bye-Laws, as should the third bullet point of Appendix 2C.	<p>Change</p> <p>To accord with the mobility hierarchy in the Sustainable transport policy, it is the intention of the guidance to make it easy for all disabled people to live in new housing development. Disabled people should have a genuine choice of housing that they can afford within a local environment that meets their needs. This means that to ensure genuine housing choice, disabled persons' parking should be provided for new residential developments.</p> <p>The guidance will be amended to state that where car parking is required to be provided, at least one space should be accessible to people with disabilities.</p> <p>In larger developments, the draft guidance requires that at least ten percent of provision should be for people with disabilities.</p>

³ [R_CensusBulletin3_20220504_SJ.pdf \(gov.je\)](#)

Consultation feedback	Response
	The revised supplementary planning guidance relates to parking space that is required to be provided for residential forms of development. The specification for car parking space, in Part 8: access to and use of buildings, of the technical guidance for Building Bye-laws relates to buildings other than dwellings.

7. Please state whether you agree or disagree that 20% of all car parking spaces in residential development, where more than five car parking spaces are provided, should have an active electric vehicle chargepoint; and that the remaining 80% of car parking spaces should benefit from passive provision (cabling and powers supply), so that a socket can be added at a later date.



Consultation feedback	Response
This is a good starting point provided the capability provisioning is also delivered (future proofed)	Noted.
As Jersey heads towards a future with electric cars this makes sense (which is also the reason that space allocated for cars should not be reduced but increased as the population increases too).	Noted.
3.4 Electric charging infrastructure. Agreed and supported. The JEVCo/Andium partnership provides for an EVCP network to support the deployment of shared transport vehicles in Shared Transport Hubs	Noted.
See comments on "Shared Transport Hubs" above on how these can be better addressed to meet the objectives. All JEVCo/Andium shared transport vehicles are supported by EVCPs. It is more cost effective to do so in a concentrated deployment of vehicles than on a development-by-development basis.	It is considered appropriate that where parking space is provided as part of new residential development, it is supported by electric vehicle charging infrastructure. This is important to assist and enable the uptakes of EVs. The guidance already makes clear, however, that planning obligation agreements (POAs) may be used to secure the direct provision of [and/or funding for] additional parking infrastructure, facilities or services that will be required as a

Consultation feedback	Response
	result of development, which could legitimately embrace off-site electric vehicle charging infrastructure.
As the spaces can only be used whilst charging (currently) I would suggest incentivising the cost of purchasing electric and/or hybrid cars should be a higher priority as these spaces are so often left empty as users don't always need to charge their cars.	This guidance can only deal with the provision of parking space. Other work is already underway to incentivise the uptake of electric vehicles.
Our stance is that EVs will not save the world, or reduce congestion, tyre pollution or address the rise in obesity and other sedentary lifestyle related diseases. However, it seems appropriate to consider electric charging provision for residential spaces.	One of the ten principles identified in the Sustainable transport policy seeks to encourage the use of zero emission vehicles to reduce pollution. Speeding up the adoption of electric vehicles is a policy objective of the island's Carbon neutral roadmap ⁴ This guidance seeks to support this objective by ensuring that new development has the requisite infrastructure that is required to enable this transition.
One of the major reasons for the policy direction of reducing car use is to limit carbon emissions. As more and more people switch to electric, this will eventually diminish as a valid concern.	See above.
Surely 100% of spaces should be, if the Island is going to force people to buy electric vehicles?? Especially for residential spaces.	The draft guidance proposes that all new car parking spaces should be supported by electric vehicle charging infrastructure.
All new parking spaces should have vehicle charging.	See above.
The Guidance needs to allow for future proofing of alternative systems other than full electrical battery charging, otherwise this strategy is adding cost and carbon for installing infrastructure that may become obsolete. Research currently indicates that the merging preferable technology for batteries is likely to be hydrogen as opposed to lithium, therefore, the guidance will hamstring developers unnecessarily.	The island's Carbon Neutral Roadmap (gov.je) focuses on the uptake of EVs, with a commitment to keep a 'watching eye' on other technologies. The process of decarbonisation cannot, however, wait until newer, better technologies become viable. There are currently very few hydrogen cars available; a safe hydrogen storage facility would be required in the island as well as access to a supply of green hydrogen. The main advantage of hydrogen over EV relates to the speed of refill relative to charging, however, given the small distances travelled in Jersey this benefit may not be significant.
Time may show that electric vehicles are not the only solution.	See above.
Again, 20% of what? The inference is that all cars will eventually be electric but this has not been properly established as fact.	Change The draft guidance proposes that all new car parking spaces should be supported by electric vehicle charging infrastructure; with 20% of provision being 'active' i.e. ready for use. The draft guidance is to be revised to ensure that all car parking spaces provided as part of residential development are supported by passive EV charging

⁴ See Policy TR1: [R Carbon Neutral Roadmap 20220525 JB.pdf \(gov.je\)](https://www.gov.je/carbon-neutral-roadmap)

Consultation feedback	Response
	<p>infrastructure so that an EVCP can be added as and when it is required. There is to be no requirement for active EVCP provision. This is considered to be a more efficient and effective way of supporting the transition to EVs, and ensures that chargepoint provision is up-to-date and matched to demand.</p> <p>See above for consideration other potential fuel sources.</p>
<p>There is also a risk that advancements in i) battery technology (that significantly extend the range in battery electric vehicles (BEVs)) and ii) fuel cell electric vehicles (FCEVs) that use hydrogen as the fuel source, could result in the Electric Vehicle charging infrastructure not being fully utilised.</p>	<p>See above.</p> <p>The pace at which charging infrastructure is provided is important. A lack of charging infrastructure often cited as a reason people aren't ready to switch away from internal combustion engine vehicles. It is, therefore, considered important that new development provides the necessary charging infrastructure to be able to make the switch.</p> <p>The potential for the extent of active provision to be 'mismatched' to demand from residents is noted.</p>
<p>EV charging infrastructure can be delivered in several ways. It is important that all the available options for EV charging are clearly defined, and any additional considerations taken into account.</p> <p>In order to minimise the cost of any additional network infrastructure, and for customers to take advantage of lower cost overnight electricity, these guidelines should incentivise and promote the use of overnight charging (a period where significant capacity in the network exists).</p> <p>Jersey Electricity has already launched Easycharge, a product which offers customers a charger/charging bundle, all for an affordable monthly fee, whilst encouraging overnight smart charging.</p>	<p>Change</p> <p>It is recognised that there is a public benefit in seeking to ensure that electric vehicles are charged overnight when there is less demand on the island's power network, and when the cost of electricity is cheaper. This can also serve to avoid the requirement for further specific investment in enhancements to the existing network (which will likely affect all consumers through increased costs of electricity).</p> <p>The guidance will be revised to require smart functionality where EVCPs are installed.</p>
<p>(Section 3.4) Active provision is defined as an actual, ready-to-use Electric Vehicle Charge Point (EVCP), connected to an electrical supply system.</p> <p>When EVCP's are installed as part of 'active provision', we suggest a mandate that they are Smart chargers, as defined in Regulations: electric vehicle smart charge points - GOV.UK (www.gov.uk) which ensures that charge points have smart functionality, allowing the charging of an electric vehicle when there is less demand on the grid, i.e. overnight.</p>	<p>See above.</p>
<p>Smart Chargers – The Electric Vehicles (Smart Charge Points) Regulations 2021 is the underpinning UK legislation, and all installed EVCP must be 'smart' enabled and meet similar guidelines. The regulations ensure charge points have smart functionality, allowing the charging of an electric vehicle when there is less demand on the grid.</p>	<p>See above.</p>
<p>For charging that is provisioned in underground car parks, robust and secure communications protocols; WI-FI, GSM etc should be provided. In addition to the above, to minimise any costs of extra network infrastructure, and for</p>	<p>See above.</p>

Consultation feedback	Response
customers to take advantage of lower cost overnight electricity, these guidelines should incentivise and promote the use of overnight charging.	
With regard to the specific detail in the guidelines, JE support the installation of electric vehicle charge points (EVCP's), referred to in the draft as 'active provision', in small developments of up to five premises but reiterate that the concept of low cost, overnight charging should be a pre-requisite.	<p>Change</p> <p>The draft guidance is to be revised to ensure that all car parking spaces provided as part of residential development are supported by passive EV charging infrastructure so that an EVCP can be added as and when it is required. There is to be no requirement for active EVCP provision. This is considered to be a more efficient and effective way of supporting the transition to EVs, and ensures that chargepoint provision is up-to-date and matched to demand.</p> <p>The guidance will be revised to require smart functionality where EVCPs are installed.</p>
<p>(Section 3.4) EV charging infrastructure can be delivered in several ways. It is important that the available options for EV charging are clearly defined.</p> <ul style="list-style-type: none"> • On premise charging– Active/Passive supply attached to the property, for personal use by the property it is attached to. • Off premise charging – Active/Passive supply not directly attached to the property, for personal use by the property it is allocated to. This could be a remote, above ground parking space. • Multi premise charging – Active/Passive supply not directly attached to the property, for personal use by the property it is allocated to. This could be a remote, underground parking space in a basement by all occupiers of the development. • Shared car charging - Active/Passive supply not directly attached to any particular property, for shared use by occupiers of the site/development. This could be remote, above ground parking spaces for example. • Visitor charging – Charging in designated visitor spaces <p>(See Appendix A of this consultation response)</p> <p>In addition to the above, to minimise any costs of any additional network infrastructure, and for customers to take advantage of spare network capacity and lower cost overnight electricity, these guidelines should incentivise and promote the use of smart overnight charging.</p>	See above.
<p>In larger developments, particularly those such as apartments with parking areas that are remote from individual premises, we do not believe the recommended 20% active provision is the most equitable option to provide EV charging.</p> <p>In these scenarios, we suggest an option is introduced for developers to provide 'passive provision' only' for the</p>	See above.

Consultation feedback	Response
<p>whole development (total number of premises); a Charge Point Operator (CPO) could provide these services in the future. The CPO will provide customers with access to EVCP's, and we believe that the 20% active provision rule in this scenario would be unhelpful and in many cases result in a waste of resources.</p>	
<p>Simplification and futureproofing is key. To this end, a simpler and more cost-effective solution for all is to fully provision the installation of Passive EV Charge Points in every location.</p> <p>This will allow the market to develop new products and offers, like Jersey Electricity's EasyCharge product, whereby EVCP are installed and managed on behalf of the customer, ensuring low-cost charging whilst maximising the use of the electricity network.</p>	See above.
<p>We also consider it essential that all parking spaces are fully provisioned with electrical infrastructure for future smart EV charging, with the same concept of low cost, overnight charging as in the 'active provision'.</p> <p>We therefore support the definition of 'passive provision' and the application of this requirement to all parking spaces (Recognising that provision is only made for one charger per premise – i.e. a premise with two parking spaces will have provision for one charger to be installed.).</p>	<p>Change</p> <p>The draft guidance is to be revised to make clear that in the case of a home with more than one parking space passive electric charging infrastructure is only required to be provided for one car parking space.</p>
<p>The definition of 'passive provision' should be clear and unambiguous and we recommend some slight alterations, which are detailed in our response below.</p> <p>Passive provision is defined as a live, tested electricity supply, adequately protected and terminated at the parking space by means of an isolator, so that at a future date an EVCP can be added easily. This allows the home or site owner to install the most advanced and appropriate type of chargepoint equipment at a later date, but at a cheaper cost than if full retrofitting was required.</p>	<p>Change</p> <p>The draft guidance is to be revised to provide a clearer definition of passive provision.</p>
<p>There is a significant cost to the delivery of the infrastructure for Electrical Vehicle charging on large residential apartment developments in terms of dedicated switch-rooms, switchgear, containment and cabling. Whilst the draft SPG will minimise the future installation cost for the end user, the Developer will reflect the additional infrastructure costs in the purchase price for a private car parking space regardless of whether an owner installs an EVCP.</p> <p>As an alternative, it could be considered appropriate for the Developer to install the dedicated switchrooms and switchgear (that are approximately 30% of the total cost of</p>	<p>Change</p> <p>One of the ten principles identified in the Sustainable transport policy seeks to encourage the use of zero emission vehicles to reduce pollution. Speeding up the adoption of electric vehicles is a policy objective of the island's Carbon neutral roadmap⁵</p> <p>This guidance seeks to support this objective by ensuring that new development has the requisite infrastructure that is required to enable this transition.</p> <p>The draft guidance is to be revised to ensure that all car parking spaces provided as part of residential development are supported by passive EV charging</p>

⁵ See Policy TR1: [R Carbon Neutral Roadmap 20220525 JB.pdf \(gov.je\)](https://www.gov.je/Policy-TR1-Carbon-Neutral-Roadmap-20220525-JB.pdf)

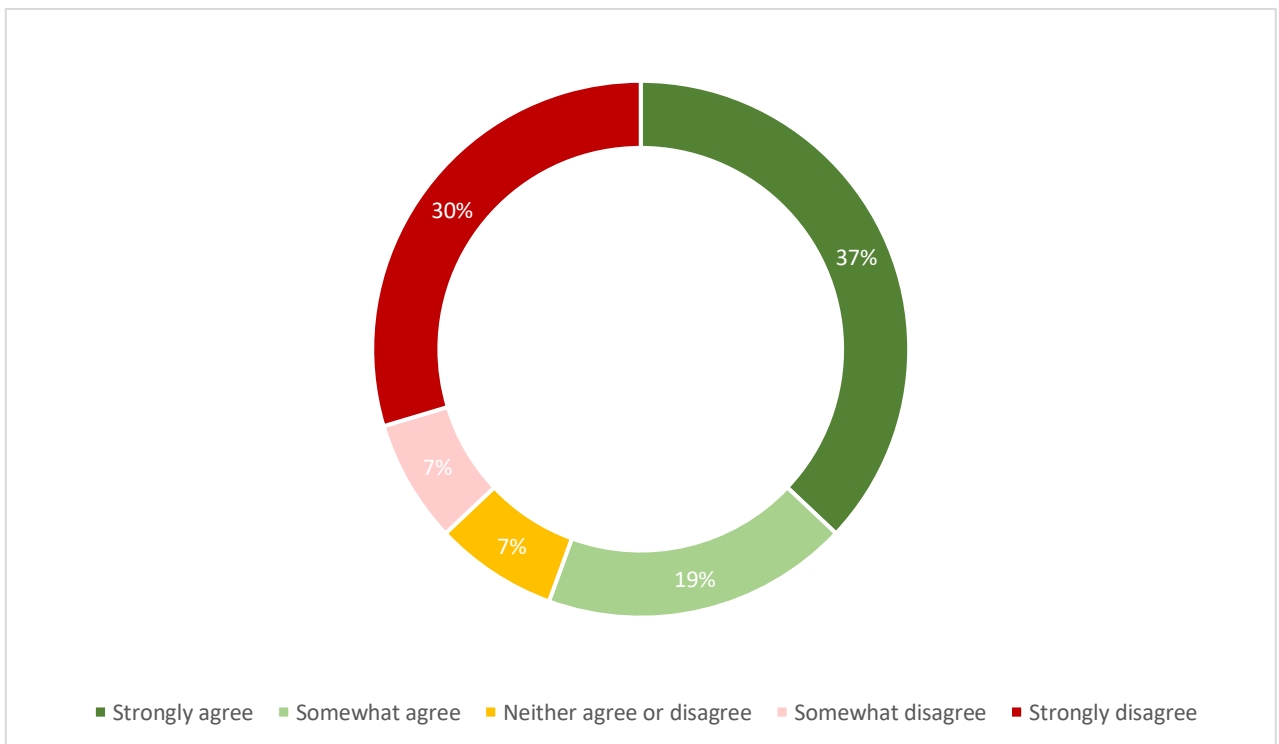
Consultation feedback	Response
<p>the Electric Vehicle charging infrastructure on large residential developments) but any installation of cabling should be for the future owners as and when they require the installation of an EVCP to their private parking space.</p>	<p>infrastructure so that an EVCP can be added as and when it is required. There is to be no requirement for active EVCP provision. This is considered to be a more efficient and effective way of supporting the transition to EVs, and ensures that chargepoint provision is up-to-date and matched to demand.</p>
<p>If the decision is taken to implement the 20% rule, clarification is needed to clearly detail what is required in different scenarios. For example, for a development with 10 spaces, would 5 be installed with Active EVCP's as a minimum, then 20% of the remaining 5 spaces (1), making a total of 6..??</p> <p>The dilemma this statement may cause is that an Active EVCP could be provisioned for non-EV users, just to achieve compliance, and potentially, an EV driver could end up with a space without charging.</p> <p>This requirement also runs the risk of developers installing EVCP's that are never put to use, adding cost to developments, wasting resources from a sustainability perspective and potentially presenting a safety risk if devices are not inspected.</p> <p>It is therefore essential that, if for any reason Active spaces are not delivered, all the available parking spaces are made 'passive' as a minimum, with a clear definition of what 'Passive' means as per '7' above. With this as a minimum standard, the eventual parking space owner can then simply install a EVCP of their choice to the already installed 'Passive' supply, thus supporting the Governments Carbon Neutral Roadmap ambitions.</p>	<p>Change</p> <p>The draft guidance is to be revised to ensure that all car parking spaces provided as part of residential development are supported by passive EV charging infrastructure so that an EVCP can be added as and when it is required. There is to be no requirement for active EVCP provision. This is considered to be a more efficient and effective way of supporting the transition to EVs, and ensures that chargepoint provision is up-to-date and matched to demand.</p> <p>The draft guidance is to be revised to provide a clearer definition of passive provision.</p>
<p>Charge Point Operators: If the 20% rule is adopted, JE recommend a 'Charge Point Operator' option be introduced as an alternative to provisioning active chargers for developments with >5 spaces.</p> <p>This option could be used when it is uneconomical to wire each EVCP back to an individual premise electricity meter, instead multiple EVCP's can be fed by a single electricity supply. An example of this would be a block of flats with an underground car park – a dedicated electricity supply and wiring could be installed to provide passive provision to every space.</p> <p>By wiring all chargers to a single supply, the installation avoids extremely long, expensive, and inefficient cable runs from the parking location to the customer's meter position. However, the trade-off is that billing, EVCP ownership and supply capacity management become important considerations.</p> <p>This is where a 'Charge Point Operator' can support the residents by managing the EV charging infrastructure and providing EV charging services. JE would recommend that for developments with >5 parking spaces a passive</p>	<p>Change</p> <p>The draft guidance is to be revised to ensure that all car parking spaces provided as part of residential development are supported by passive EV charging infrastructure so that an EVCP can be added as and when it is required. There is to be no requirement for active EVCP provision. This is considered to be a more efficient and effective way of supporting the transition to EVs, and ensures that chargepoint provision is up-to-date and matched to demand.</p> <p>The configuration of cable runs to supply electricity to EVCPs is not an issue to be managed through the planning process.</p> <p>The subsequent management of EVCPs and access to them by residents may be an issue that needs to be addressed through a management plan.</p>

Consultation feedback	Response
provision to every parking space, combined with a designated Charge Point Operator, is a more effective, equitable and sustainable solution to long term EV charging uptake.	
EV Charging Points in basements. We would ask that the safety of providing large numbers of EVCPs in a basement is considered.	<p>Change</p> <p>Empirical evidence relating to electric vehicles (EVs) is evolving rapidly as the EV industry is comparatively young (around 12 years old) in comparison with the internal combustion engine vehicle (ICEV) industry (around 150 years).</p> <p>There are concerns over potential increases in fire severity, duration and frequency associated with the increased use of electric cars and vehicle charging equipment within car parking facilities. However, it remains uncertain whether the increase in electric vehicles and charging equipment will notably increase the fire risk and/or frequency.</p> <p>The emerging risk and increased use of electric vehicles and associated charging equipment has led to a need for guidance on management of the associated risks, but consistent guidance, regulations and legislation are not yet in place.</p> <p>Changes will be made to the guidance to identify potential measures to mitigate risk related to EVCPs in covered parking spaces.</p>
Once revisions to Building Regulations are in place.	<p>The Planning and Building (Jersey) Law 2002 enables building bye-laws to specify functional requirements in respect of installations in buildings of, and standards for, electric vehicle charging points (Article 31(4) Schedule (r)).</p> <p>Currently, the installation of an EV charging point is regarded as the extension of a controlled service and fitting and is therefore building work as defined under the Building Bye-laws (Jersey) 2007. It is covered under Bye-law 15 as certifiable building work where, permission is deemed to have been granted if within 30 days of completion the scheme provider is notified of the work by a person registered under the scheme.</p> <p>See above for consideration of this issue through planning guidance.</p>
Hard to answer.	Noted.
Bicycle charging: The Parking standards should include the requirement for electric charging to be provided for cycle parking.	<p>Change</p> <p>The guidance will be revised to state that electric charging infrastructure for electric cycles should be provided with cycle parking facilities. One chargepoint should be provided for every house; with one chargepoint provided for every ten homes, or part thereof, in larger developments.</p>

Consultation feedback	Response
Motorcycle parking: Electric charging points should also be provided in all motorcycle parking hubs to encourage the use of electric motorcycles, as these are gaining popularity.	The revised draft standards relate to the level of parking provided on-site as part of new residential development only and do not relate to the provision of public parking space, including motorcycle parking hubs.

8. In St Helier town centre, where maximum car parking standards apply, there is no minimum standard for the provision of car parking space set thereby offering the potential for lower levels of car parking provision or for forms of car-free residential development in this part of the island. The guidance makes clear that in all forms of residential development, even those which might be in the town centre or 'car-free', consideration should be given to the provision of space for refuse collection, drop-off, emergency access and deliveries.

Please state whether you agree or disagree that maximum standards of car parking space provision are adopted and applied to residential development in the St Helier town centre sustainable transport zones.



Consultation feedback	Response
<p>I know that people who need parking in town will not simply stop parking in town if there are no spaces available to them. Instead, shoppers parking/parking lots/parking along the avenue etc will be used, which will reduce availability for shoppers and workers - reducing the footfall in town and opening a snowball effect of other problems.</p> <p>It is unfair that people who can't afford to live in more affluent parishes in Jersey are being affected in this way. It is wrong to assume that these people don't need a car and parking for their car, as much as people in other parishes.</p>	<p>The revised draft standards do not preclude car ownership or car use. They set out levels of car parking required to support residential development in different parts of the island based on relative accessibility and the potential capacity of residential development proposed whilst also seeking to optimise the density of development (see: Consultation on draft planning guidance for the density of residential development (gov.je)); and improve the internal and external spaces of new homes (see: Draft supplementary planning guidance: residential space standards (gov.je)).</p> <p>The extent to which on-street parking provision is controlled is also a factor that has been taken into account in defining different standards in different parts of the</p>

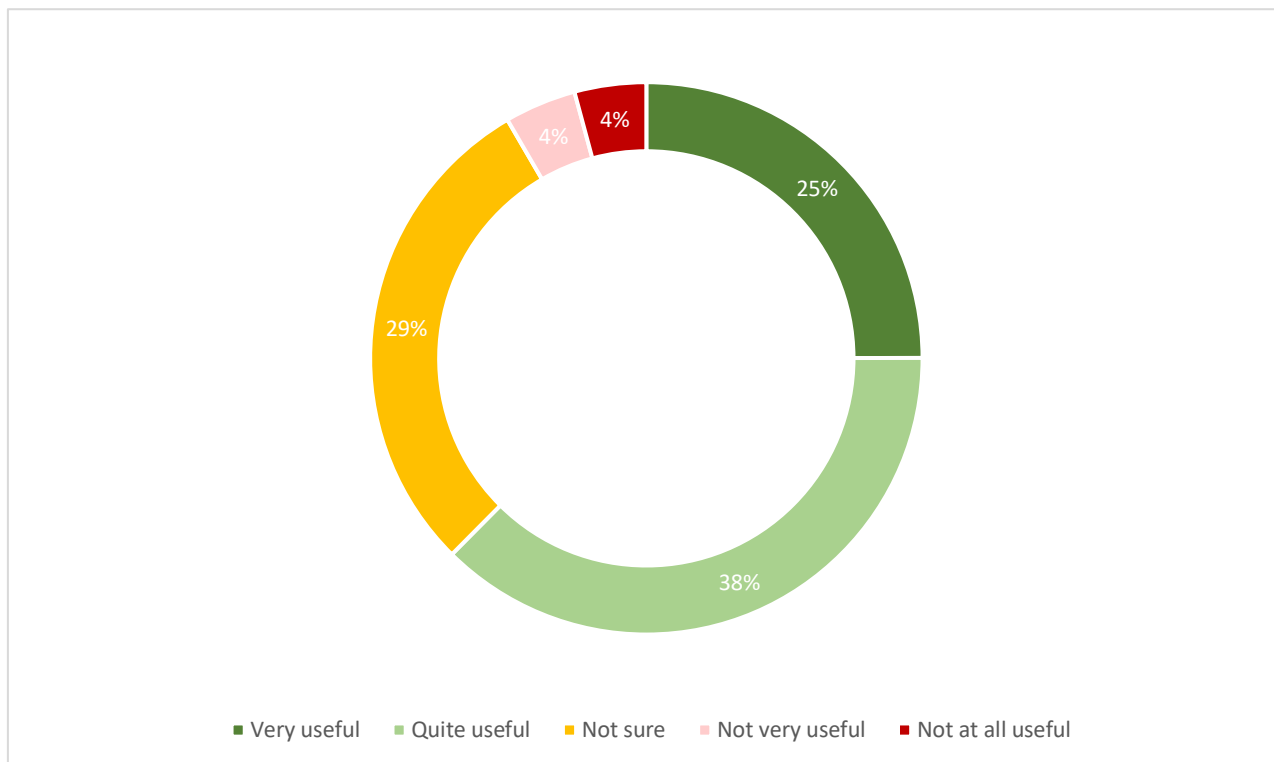
Consultation feedback	Response
	island, in order to ensure that indiscriminate parking is managed.
<p>I think it's very unfair to limit car parking spaces in new developments.</p> <p>Though I have to say, for me, I would never look to live in town so it would never affect me. If I did look to live in St Helier ever, it wouldn't be at properties with restricted or no parking.</p>	<p>The revised draft standards do not preclude car ownership or car use. They set out levels of car parking required to support residential development in different parts of the island based on relative accessibility and the potential capacity of residential development proposed whilst also seeking to optimise the density of development (see: Consultation on draft planning guidance for the density of residential development (gov.je)); and improve the internal and external spaces of new homes (see: Draft supplementary planning guidance: residential space standards (gov.je)).</p> <p>New development accounts for a small proportion of the housing market and properties with larger amounts of parking space will remain available.</p>
<p>You need to ensure policy is inclusive and not assume if you live in St Helier you do not need car space. I think this is deeply patronising</p>	See above.
<p>St Helier residents: Committee expresses concern that the Policy seems to penalise those residents living in St Helier, as St Helier residents should have the same right as those residents living in rural areas to have access to car parking.</p>	See above.
<p>As above, this limits opportunities for the poorest islanders and their families.</p> <p>Maintenance vehicles will also require access in addition to refuse, collection, drop-off, and emergencies.</p>	<p>See above.</p> <p>The guidance acknowledges that in all forms of residential development, even those which might be in the town centre or 'car-free', consideration should be given to the provision of space for refuse collection, drop-off, emergency access and deliveries.</p>
<p>Must consider that if a female is pregnant and has no option of a car they will call an ambulance.</p>	See above.
<p>Servicing of premises: Committee understands that those developments with no parking are still required to provide provision for servicing of the property i.e. bin collection all of which should be undertaken off street.</p>	See above.
<p>With the reduction in parking, it's even more important that drop-off and delivery spaces are given greater priority.</p> <p>One of our daily bike lanes is often block by large delivery trucks forcing us either to dismount and push the bike along the busy pavement or ride against the flow of traffic when the route is clear. Neither are ideal and this needs to be more closely policed if we are to encourage more cycling.</p>	<p>See above.</p> <p>The extent to which on-street parking provision is controlled is also a factor that has been taken into account in defining different standards in different parts of the island, in order to ensure that indiscriminate parking is managed.</p>
<p>This policy is visibly ruining town and retail already and the proposed policy will only increase this erosion. Cynically, I suspect that it is also a way for the States to not have to build or maintain their public car parking provision.</p>	The revised draft standards relate to the level of parking provided on-site as part of new residential development

Consultation feedback	Response
Delivery drivers have always been at the bottom of the list for consideration.	only and do not relate to the provision of public parking space to support the town's retail function. The guidance acknowledges that in all forms of residential development, even those which might be in the town centre or 'car-free', consideration should be given to the provision of space for refuse collection, drop-off, emergency access and deliveries.
A maximum standard of 1 space per dwelling in the Town Centre is considered realistic.	Noted.
There must be maximum standards for properties in other area	The limited capacity and constrained nature of the town centre road network, coupled with the objective of seeking to reduce the impact of vehicles on our townscape, justifies the adoption of maximum standards of parking provision within the town centre sustainable transport zone. It is not currently considered that maximum parking standards are currently justified elsewhere in the island, but this guidance and its operation will be kept under review.
We should be supporting car free residential development. Increasingly this is the case in London and other urban city developments where in some cases cycles are provided with each flat. Others include the availability and access to car club schemes, so Evie might be a good solution here.	The guidance does allow for car-free development to be provided where key criteria are met, and the proposal can be justified. The guidance also identifies that support may be given for residential development that does not meet adopted minimum standards, where contributions towards sustainable transport infrastructure or services, is secured, and where it can be demonstrated that any deviation will not lead to problems of indiscriminate parking in the locality.
The circumstances when car-free development is acceptable should also include the conversion of existing office buildings where no parking provision currently exists, nor can be reasonably made available. These older office buildings tend to be in Town and this will support the adaptation of existing buildings, as encouraged by the Island Plan.	Change The guidance will be revised to provide explicit acknowledgement of the potential for car-free residential development to occur when existing office buildings are converted to residential use and here there exists no on-site parking provision.
It should be up to the developer. I don't mind not having minimums, but if a developer has identified a need for more parking spaces than the maximum, why not?	The limited capacity and constrained nature of the town centre road network, coupled with the objective of seeking to reduce the impact of vehicles on our townscape, justifies the adoption of maximum standards of parking provision within the town centre sustainable transport zone. The guidance acknowledges that variation from maximum standards may relate to the intended use or occupants of the development (e.g. where there may be a greater proportion of people with disabilities), and should be addressed as part of a travel plan for the development.
5. Residential parking standards	Noted.

Consultation feedback	Response
JEVCo comments: See comments on “Shared Transport Hubs” and “POAs” above on how these can be better addressed to meet the objectives.	
Section 5 includes reference to the provision of car-free development requiring justification against a series of tests in “section 5.1.1”. This reference is, I think, incorrect and should be 5.5.1.	This typo is acknowledged and will be amended.

9. Appendix 2 of the draft guidance sets out specifications for different forms of parking space, including that for different types of bike; motorbikes; and cars.

How useful do you think this section of the guidance is?



Consultation feedback	Response
<p>3.3.1 Cycle Parking space: Government approach is supported.</p> <p>JEVCo plans to deploy bike hubs within the Shared Transport Hubs being developed in partnership with Andium.</p> <p>JEVCo is the Channel Islands agent for Cyclehoops - existing sites where Cyclehoop bike parking has been supplied by JEVCo can be seen at private locations in Santander car park and Dolan Hotels.</p>	Noted.
<p>JEVCo has begun to deploy electric micro cars. The aim is to deliver maximum availability of car transport options reducing the impact on parking spaces. Two micro cars can fit onto one standard parking space comfortably.</p> <p>Micro cars should be encouraged by the government as part of the mix of solutions in addressing parking issues, especially in St Helier town centre.</p>	The planning system is unable to regulate the type of cars that might use car parking spaces.
<p>Consider combined parking and cycle spaces in residential developments.</p>	The integration of cycle and vehicle parking does not offer the advantages that are available with a dedicated standalone cycle parking facility. These facilities may include enhanced

Consultation feedback	Response
	<p>security measures, protection from the elements, and/or easy access.</p> <p>The guidance states that to be effective as a place to park a car (as well as a place for the storage of bicycles), garages will need to be a minimum of 3.0m x 6.0m in internal dimension.</p>
<p>Some adapted bikes may also exceed the dimensions given above so would suggest you check with Cycle Without Limits / Jersey Sport to finalise these details.</p>	<p>The revised draft standards make provision for non-standard cycles. The specifications that are set out in Appendix 2 align with Local Transport Note 1/20 Cycle Infrastructure Design (publishing.service.gov.uk) and best practice. These consider cycles of all sizes and therefore the specification set out should be applicable to all modes relevant.</p>
<p>But you need to address the e-bikes which are possibly larger and heavier when determining layout.</p> <p>Also believe that consideration should be given for some visitor guest cycle parking on site.</p>	<p>Sheffield stands are considered acceptable types of cycle parking facilities, as they allow cyclist to park correctly without the need for lifting, unlike two-tiered parking systems. While they might be slightly larger, Sheffield stands offer the advantage of accommodating e-bikes comfortably within the designated area.</p> <p>Public visitor cycle parking is typically offered in the town centre's public areas, mainly for short-term use. As a result, there is no requirement to provide visitor cycle space in the St Helier town centre STZ (STZ1). For all other parts of the island developments of ten or more homes are required to provide 0.1 visitor cycle parking space per dwelling.</p>
<p>Cycle Parking - should be in the form of "secure covered parking" (3.3.1, p5). For a three bedroom house, with each cycle parking space being required to be 0.6m x 2.0m, the covered area required is 4.8m². This is nearly half of the area once required for a minimum car parking garage.</p>	<p>Change</p> <p>The Sustainable Transport Policy sets out a series of principles to guide the development of a sustainable transport system for Jersey. This includes recognising that fewer motor vehicle journeys will be good for Jersey; and making walking and cycling more attractive.</p> <p>The revised draft guidance seeks to reduce space available for car parking provision whilst increasing the space available for cycle parking provision to help deliver against these objectives.</p> <p>The standards sought in the draft guidance are, however, when compared with other jurisdictions where cycling as mode of travel and the provision of infrastructure is better developed than in Jersey (e.g. London), aspirational.</p> <p>The standards are to be revised (i.e. reduced from those in the draft guidance) to better reflect where Jersey is currently at in terms of a transition from where no cycle parking is required (under current guidance) to the introduction of new standards; and also recognising that the provision of dedicated infrastructure to support cycle use is still nascent.</p>
<p>I have been scoping out an upcoming project in Town Core to provide two 2-bedroom 3-person flats above a 51 sqm retail shop. Studying guidance in above draft SPG about cycle parking I note this project will require 6 bicycle parking spaces. Looking at figure 4 on page 17</p>	<p>See above.</p>

Consultation feedback	Response
<p>this would require an undercover store 5.8m x 2.4m = 13.92 sqm.</p>	
<p>I note there is no mention in SPG about alternative types of bicycle storage, such as vertical bike racks. These are much more efficient requiring a substantially smaller space for storage.</p> <p>What would be the policy for Planning agreeing these alternative solutions, which are widely adopted across UK, or maybe these solutions should be covered in the SPG?</p>	<p>Sheffield stands are regarded as suitable cycle parking facilities because they enable cyclists to park effortlessly without requiring any lifting, unlike vertical bike racks (two-tiered parking).</p> <p>It should be taken into consideration that e-bikes are often a lot heavier than traditional cycles and therefore they are not practical to use with these parking facilities.</p>
<p>Cycle parking space & Appendix 2A: Specification – cycle parking space</p> <p>Innovative cycle storage solutions are commonplace in the UK and in Europe. Alternative products that allow secure wheel and frame locking with space saving opportunity include vertical and semi-vertical racks, two-tier,racks and cycle pods. We suggest that the 'acceptable' types of cycle parking facility and the permissible parking space dimensions are expanded to allow for alternative proposals.</p>	<p>See above.</p> <p>The use of secure-wheel or frame-locking parking methods may discourage cyclists from parking in certain locations due to the disadvantages that they bring including potential damage to a cycle and more susceptible to theft.</p>
<p>Communal secure bicycle stores are not supported, yet are a much more efficient way of storing bicycle when compared to the proposed smaller compartments. Likewise the cycle storage diagrams are not very innovative- there are hydraulic double stacking bicycle stands that will securely hold 2 bike in 400mm wide centres. Equally there are secure wall-mounted bicycle holders which would work really well on generously wide access decks and where goods-type lifts are installed. There are those who are also comfortable string their bicycles in their homes on wall brackets. The SPG is either silent on these innovative ideas or does not support them, and should be changed to do so.</p>	<p>Communal cycle stores are referenced in Appendix 2A and provide a solution for communal cycle parking: these consist of Sheffield stands.</p> <p>Sheffield stands are regarded as suitable cycle parking facilities because they enable cyclists to park effortlessly without requiring any lifting, unlike vertical bike racks (two-tiered parking). It should be taken into consideration that e-bikes are often a lot heavier than traditional cycles and therefore they are not practical to use with these parking facilities.</p> <p>Likewise, the use of secure-wheel or frame-locking parking methods may discourage cyclists from parking in certain locations due to the disadvantages that they bring including potential damage to a cycle and more susceptible to theft.</p>
<p>In the centre of paragraph of 3.3.1 is a suggestion that in order to reduce the risk of theft "collective storage should ideally be divided into smaller compartments....."</p> <p>This is not accompanied by any evidence in relation to a increase in theft occurring when a store is formed from over 12 spaces. Communal stores are entirely appropriate if they are accessible, secure and attractive. Larger stores can have greater through-put of users and so increased passive observation. The optimal use of space can be achieved through double-stacked spaces which are motorised, counter-balanced or hydraulically assisted. Double-sets of doors can be easily opened with touch-pads.</p> <p>Continued commentary then specifically prescribes rather utilitarian storage, particularly the last paragraph</p>	<p>See above.</p>

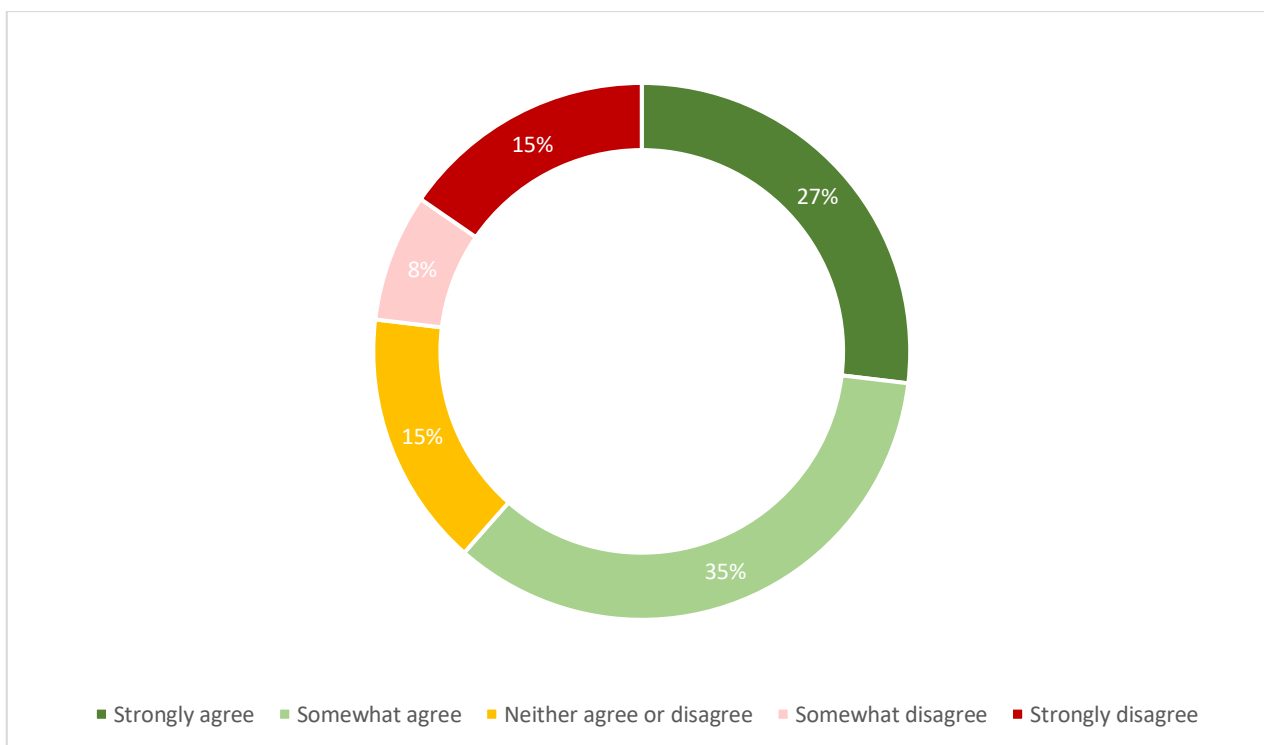
Consultation feedback	Response
of 3.3.1 (and Appendix 2). This is overly-restrictive, inhibits creativity and is one-dimensional in its approach.	
The SPG notes that cycle parking should be located as close as possible to the entrance of the building they are intended to serve (3.3.1, p5). This is understandable, but may be interpreted by applications officers as a requirement rather than as a preferred solution. In terrace housing situations, bike storage would normally be best provided in rear gardens with pathway access to the public road system. Otherwise there will be visual clutter on the street frontage.	Remote cycle parking or increased effort to park safely is likely to reduce the rate of cycling and reduce the likelihood of the cycle parking being utilised. Guidance is to be used and applied appropriately relative to the circumstances of individual cases.
Why should bike stores not be provided in association with bin stores? Surely, if they are adequately separated, there is no problem with this?	Communal forms of cycle storage should be placed in a convenient location, that is secure, easy to use, adequately lit and sheltered. The provision of parking facilities that are separated from bin stores would accord with the guidance.
Cycle storage hubs: Recommend that large developments of 6 or more units of accommodation should incorporate a cycle storage hub complete with cycle washing facility and maintenance bench/stand within the hub to enable residents to maintain and clean their cycles in a dedicated space and also helps to encourage cycling. There should also be consideration given to cycle lockers	This is an issue related to travel planning and is not specifically related to planning guidance about parking standards. Under the auspices of Policy TT1 of the bridging Island Plan, development which has the potential to generate significant amounts of movement must be supported by a transport assessment and a travel plan. This will be required to demonstrate how a development proposal, in its design and long-term use, has responded to the sustainable transport principles and how it will promote and encourage more sustainable travel in the island.
Delighted to see that the Jersey parking space size is being revised to meet the UK standard width and length. I look forward to being able to open my door once I have parked in future.	The size of car parking space has been increased from 2.4x4.8m; to 2.5 x 5.0m.
Parking spaces need to be 5mx 2.5m min wherever possible.	See above.
Cars have gotten larger over the last decade or so and don't seem likely to be reversed any time soon.	See above.
Good for context so people adhere to minimum standards. Turning space also key to call out	The guidance makes clear that for larger residential developments with communal parking areas, sufficient manoeuvring space should be provided to enable all vehicles including emergency, service and delivery vehicles, to enter and exit the site in a forward gear.
The minimum specification for a single garage is noted as being 3m wider by 6m long. Previously the minimum size was 2.4 x 4.9. This previous figure is too small given the general increase in car size, but the new figures seem quite large – is there any science behind this increased proposal?	Change The guidance makes clear that to be effective as a place to park a car (as well as a place for the storage of bicycles), garages will need to be a minimum of 3.0m x 6.0m in internal dimension.

Consultation feedback	Response
The note on p.18 of the document notes that the increased size is to allow for parking for one car and space for cycles, but if four cycles are required in a 3 bedroom house, I am not sure how this would work.	The cycle parking standards are to be revised (i.e. reduced from those in the draft guidance) to better reflect where Jersey is currently at in terms of a transition from where no cycle parking is required (under current guidance) to the introduction of new standards; and also recognising that the provision of dedicated infrastructure to support cycle use is still nascent.
The dimensions of a 'compliant' garage (in Appendix 2C) are too rigid. For example, A garage of 5m x 4m would be larger and deliver the intended outcome, but would not appear to compliant with the minimum specification.	This note is intended to provide guidance. If there are circumstances where a different garage configuration is proposed and considered to be acceptable by the applicant, this should be justified relative to the standards and specifications set out in the guidance.
In the last paragraph of 3.2.2 the text sets out that "The provision of garages will only contribute towards...." This is an issue that the Planning Committee have struggled with, and they have been recorded as disliking garages generally, as they are of the opinion that (to paraphrase) they are never used for car parking. The intention of this text is therefore welcomed, and an edit is suggested to provide clarity and a positive emphasis by the removal of "only" and so read: "The provision of garages will contribute towards....".	Noted.
The size of a parking space adjacent to a home is required to be capable of being widened by 1.2m. It is not clear whether all such spaces have to be capable of this, or just 1 per dwelling. The impact of this, if applied to all spaces is to increase the area required for parking spaces by 50%.	Change This provision has been included to enable homes, including parking space to be more resilient and adaptable to the changing circumstances of occupants. It is intended that up to one space adjacent to a home should be capable of adaptation in this way. The guidance will be amended to provide greater clarity in this respect.
A garage is defined as having to store a car and bicycles but the applicant should have the choice of providing these in separate locations/buildings.	For houses, the guidance makes clear that long-stay cycle parking, for the occupants of houses, should be in the form of secure covered parking, such as within an appropriately sized garage, shed or store. There is no prescription – especially given that this is guidance - that the provision of the requisite amount of parking space has to be provided in one form of provision: it can be met through a combination.
Front garden parking – The previous Island Plan had a distinct and clear policy for this. The fact that this is now within a wider policy and within a long section on Car Parking Spaces, means it may get overlooked.	As a policy requirement in the island plan, that is supported by planning guidance, it is a material consideration for any development proposals involving the loss of front gardens and is required to be taken into account by virtue of Article 19 of the Planning and Building (Jersey) Law.
The loss of front gardens (final paragraph of 3.3.4) is not always controlled by a planning application. If the road is in private ownership, then it is Permitted Development to turn your front garden into a car parking space, including adding a new access to the	The Planning and Building (General Development)(Jersey) Order specifies the circumstances where planning permission is required for the creation of direct access to/from the public highway involving the loss of front gardens, and it is in these circumstances that policy provision is made to regulate this

Consultation feedback	Response
road. If this is to be resisted, the why is it specifically 'approved' already by Order?	form of development, as set out in the bridging Island Plan at Policy TT4.
Other Considerations (section 3.6) would be better described as "Demonstrating Compliance and Safe Access", so that users can find it more easily.	Noted.
<p>At paragraph 3.6 reference is made to the need to also take account of "Access onto the Highway" (December 2019). It is unclear if this document has any formal status (and whether it has been subject to consultation and Ministerial endorsement). From practical experience it does not seem to be used by 12 of the 13 Highways Authorities in Jersey.</p> <p>It also highlights the need for consistency across all policy documents, as it includes a difference quantitative requirement for cycle parking than is proposed in the subject consultation draft SPG. If both become adopted, which has precedence?</p>	<p>Change</p> <p>Access onto the Highway - Standards and Guidance is, as stated, a technical guide for the preparation of planning applications. It is issued under the provisions of Article 66 of Road Works and Events (Jersey) Law 2016 by the Minister for Infrastructure and principally relates to technical requirements of works affecting roads.</p> <p>Guidance issued by the Minister for the Environment related to the provision of space for cycle parking (which is not a technical requirement related to road works), under Article 6 of the Planning and Building (Jersey) Law, has precedence in relation to planning decisions where it is a material factor.</p> <p>The guidance will be amended to clarify the status of this guidance relative to other publications which may make reference to expectations for cycle parking provision.</p>
Servicing and delivery spaces (referred to in section 3.3.5) should be included in Appendix 3C.	Requirements for servicing and deliveries should be considered on a site-by-site basis.
<p>Planning conditions and obligations</p> <p>POA's should also be used for the provision of off-site shared car charging (in car parks and on-street) or on-site visitor charging.</p>	The guidance already makes clear that planning obligation agreements (POAs) may be used to secure the direct provision of [and/or funding for] additional parking infrastructure, facilities or services that will be required as a result of development, which could legitimately embrace electric vehicle charging infrastructure.
<p>POA's should be extended to provide public charging infrastructure in all areas, and not be limited to areas adjacent to the proposed development. POA's can be used to provision charging when there is a reduced level of charging on the particular development. This is important in developments where the provision of parking spaces are reduced due to location in the Sustainable transport Zones (STZ).</p> <p>POA's should also be used for the provision of Shared car charging or Visitor charging.</p>	<p>See above.</p> <p>POAs need to be necessary to make the development acceptable in planning terms, meeting the objectives of the Island Plan; directly related to the development; and fairly and reasonably related in scale and kind to the development.</p> <p>If and when the provision for off-site charging infrastructure is justified, Policy TT4 clearly states that to encourage a shift to more sustainable modes of transport, support may be given for development that does not meet adopted minimum standards, where contributions towards alternative parking elsewhere, or sustainable transport infrastructure or services, is secured. Any such contribution would need to be secured through a planning obligation agreement.</p> <p>The guidance further supports this by stating that: planning obligation agreements (POAs) may be similarly used to secure the direct provision of [and/or funding for] additional parking infrastructure, facilities or services that will be required as a result of development.</p>

10. Appendix 3A of the draft guidance sets out standards for the provision of cycle parking.

Please state whether you agree or disagree with the proposed cycle parking standards.



Consultation feedback	Response
<p>The requirements for cycle parking and non-standard cycle parking become significantly onerous in relation to spatial requirements for the 'ground floor' in the consideration of the modification /conversion or adaption of existing residential properties where the number of provided units is modest right up to a typical conversion of existing generally under-utilised floorspace over a ground floor retail unit, where the potential of yield units is greater.</p> <p>The requirement of cycle parking in these situations is particularly onerous in consideration of land grab for the ground floor where this is required to retain a functioning and valuable commercial retail resource. This can make or break a projects economic viability exacerbating the existing housing crisis and rendering underused space functionless.</p> <p>The level of bicycle parking provision has to be in balance and considered part of a more holistic approach to actually support and encourage cycling.</p> <p>The focus should be towards the change in attitude to use bicycles, but this will only be achieved if there is the holistic infrastructure in place in the wider context. Significant investment is required to achieve improved safe cycle routes and centralised / community parking provision at destinations.</p>	<p>Change</p> <p>The Sustainable Transport Policy sets out a series of principles to guide the development of a sustainable transport system for Jersey. This includes recognising that fewer motor vehicle journeys will be good for Jersey; and making walking and cycling more attractive.</p> <p>This policy can only take effect if people start to accept change by making decisions to switch transport modes for some journeys and that starts with increasing the infrastructure that supports more walking and cycling, including cycle parking. The provision of cycle parking facilities as part of residential development can help encourage more people to cycle more.</p> <p>It is also recognised that investment is required in other public infrastructure to support cycling. Work has been undertaken within the ring road of St Helier to create a mobility plan. The plan will identify schemes which can be delivered to make the ring road more accommodating for cycling and walking and reduce the difficulty in crossing the ring road for those travelling into town by these modes, and for residents and town users who want to cycle or walk around the town on less congested roads.</p> <p>Strategic corridors for cycling across the island have also been identified and audited using best practice route</p>

Consultation feedback	Response
	<p>selection tools to ensure a consistency of approach. Investment is to be made in this infrastructure to create an island-wide strategic cycling and walking network</p> <p>It is, however, accepted that this transition will take time to achieve and that, in terms of the requirement for the provision of cycle parking in association with residential development, is starting from a low base. The revised draft guidance seeks to reduce space available for car parking provision whilst increasing the space available for cycle parking provision to help deliver against these objectives.</p> <p>The standards sought in the draft guidance are, however, when compared with other jurisdictions where cycling as mode of travel and the provision of infrastructure is better developed than in Jersey (e.g. London), aspirational.</p> <p>The standards are to be revised (i.e. reduced from those in the draft guidance) to better reflect where Jersey is currently at in terms of a transition from where no cycle parking is required (under current guidance) to the introduction of new standards; and also recognising that the provision of dedicated infrastructure to support cycle use is still nascent.</p>
A cycle provision increase from, informally 1 bike per bedroom to 1 bike per occupant is too excessive and should not be a requirement	See above.
The ... cycle space requirements, which do not vary depending upon the STZ, are too high.	See above.
<p>Cycle Parking</p> <p>The cycle parking requirements are too high. Large numbers of spaces are likely to remain unused. Each space requires 1.2sqm, and the cumulative area of land required will be significant. When added to the land required to satisfy the standards in other draft SPGs, the requirements are likely to be prove impractical and to prevent developers achieving the housing required in the BIP.</p> <p>On larger developments an average provision should be considered.</p>	See above.
<p>In relation to the quantitative cycle parking requirements, the approach has moved from the current informal position of 1-space-per-bedroom (required via the Access onto the Highway, December 2019, document) to 1-space-per-prospective-occupant. This is a significant change and assumes that everyone will want to cycle.</p> <p>We have recently been involved in a project where the cycle parking was shown as 263 spaces (slightly over 1 space per bedroom) and the feedback from IHE Transport (less than 18 months ago) include a comment that this "can bring the efforts of the Government and Parish into disrepute by having too many vacant stands." Applying the draft Standards would now require 416 spaces, being a</p>	See above.

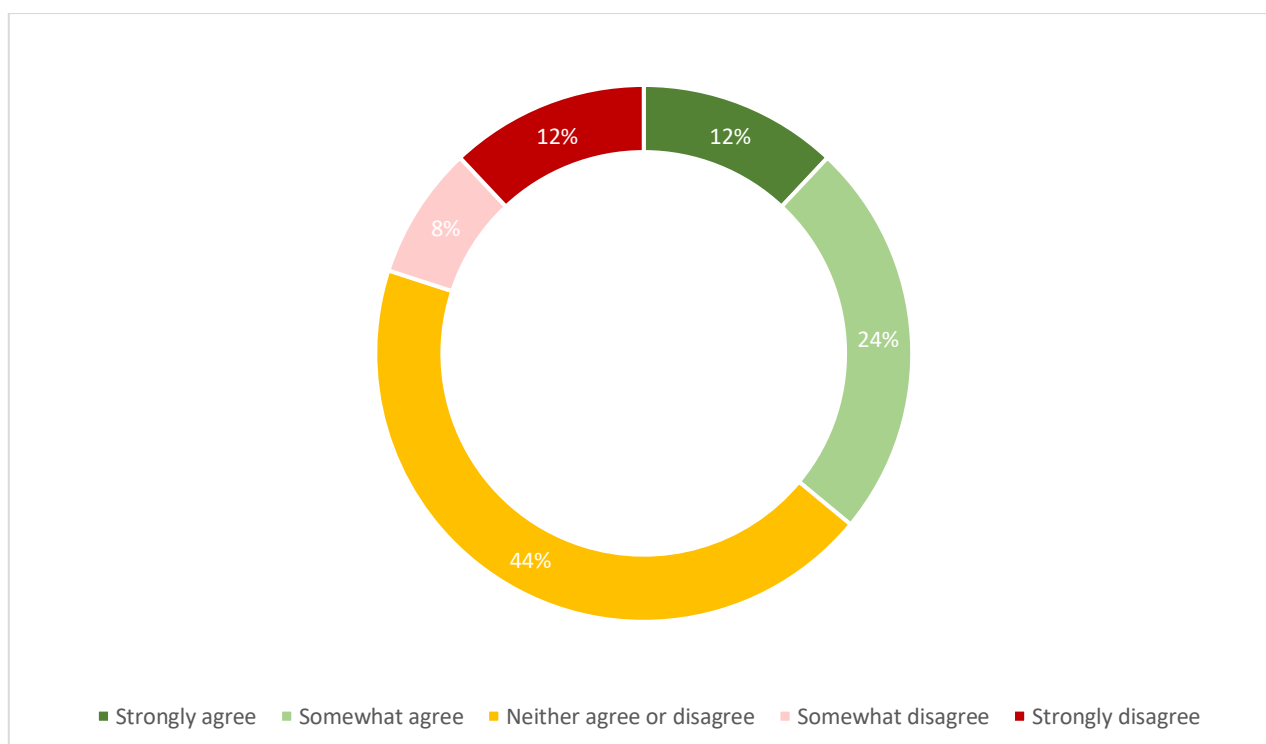
Consultation feedback	Response
<p>57% uplift from a position that was already considered to risk bringing policy into disrepute.</p> <p>The level of change needs to be moderated, as part of a rounded approach to actually support cycling, by providing better infrastructure. Away from key routes (the Railway Walk / Avenue) the cycle network on the is poor, little of it is segregated from vehicular traffic, particularly in the town centre and around schools. This means cycling is not (yet) an attractive alternative to the private car for many people.</p> <p>It is my view that adopting the currently informal "1 space-per-bedroom" approach is the correct position for the current context. Wider improvements to the cycling network, through significant and concerted efforts and investment of Government (not just Planning Obligation Agreements funded on developers) should be a parallel workstream to make cycling more attractive, ahead of requiring a level of cycle storage that is completely disproportionate to the current levels of cycling activity.</p> <p>The focus needs to be on getting people to use bicycles, not just (over) providing storage space for them.</p>	
<p>Residential parking standards & Appendix 3A: Cycle parking standards</p> <p>The dedicated storage space for cycles in London is 1 per 1 or 2-bedroom dwelling, and 2 per 3 or more-bedroom dwelling.</p> <p>As comparison, a 10-dwelling mixed flat type development in a built-up area in Jersey will provide more than 250% more cycle storage than a similar development in London. If such storage areas are enclosed this will further dilute the net to gross ratio. What was the evidence base for the cycle parking provision figures, particularly in the context of forecast age demographics for the island?</p>	See above.
<p>In summary, the proposed residential parking standards seek to promote more sustainable travel modes and place onus on the proliferation of the bicycle.</p> <p>The proposed quantum of cycle storage for Jersey significantly exceeds the current UK standards and could prejudice designs to the detriment of on-street amenity and prohibit conversion to non-residential uses in the future. As designers we would encourage a balanced approach to the cycle standards and the flexibility to consider viable provision on a site-by-site basis.</p>	See above.
<p>They are good, but I would suggest a minimum amount for >4-bed homes. A simple 1 per unit + 1 per bed rule would be better.</p>	See above.
<p>Cycle ratio residential: There should be at least 1 cycle space per bedroom for all residential developments, and visitor spaces. The cycle spaces will need to cater for large</p>	<p>See above.</p> <p>Visitor cycle parking is typically offered in the town centre's public areas, mainly for short-term use. As a result, there is</p>

Consultation feedback	Response
cycles such as adapted and cargo cycles, which we note is already proposed.	<p>no requirement to provide visitor cycle space in the St Helier town centre STZ (STZ1). For all other parts of the island developments of ten or more homes are required to provide 0.1 visitor cycle parking space per dwelling.</p> <p>The revised draft standards make provision for non-standard cycles. The specifications that are set out in Appendix 2 align with LTN1/20 and best practice. These consider cycles of all sizes and therefore the specification set out should be applicable to all.</p>
<p>Perhaps the opportunity of the POA process can be applied to the larger redevelopment of existing town/high street building projects to offset the requirement to land grab prime ground floor retail / commercial space to provide for a centralised fund that promotes community parking areas for bicycles. The POA process needs to be publicly clearer and the targets and goals more transparently communicated so that the perception of 'stealth tax' is removed and actual physical works progressed and achieved to the community benefit.</p> <p>There are many examples of community bicycle parking solutions around the world and I wonder if these are being considered in this process as part of the desire to improve the public realm.</p>	<p>POAs need to be necessary to make the development acceptable in planning terms, meeting the objectives of the Island Plan; directly related to the development; and fairly and reasonably related in scale and kind to the development.</p> <p>If and when the provision for off-site charging infrastructure is justified, Policy TT4 clearly states that to encourage a shift to more sustainable modes of transport, support may be given for development that does not meet adopted minimum standards, where contributions towards alternative parking elsewhere, or sustainable transport infrastructure or services, is secured... Any such contribution would need to be secured through a planning obligation agreement.</p> <p>The guidance further supports this by stating that: planning obligation agreements (POAs) may be similarly used to secure the direct provision of [and/or funding for] additional parking infrastructure, facilities or services that will be required as a result of development.</p>
Non-standard bikes. Appendix 3A requires "five percent or 0.2 per dwelling". As 0.2 per dwelling equals 20%, this is a huge range.	<p>Change</p> <p>This is a typo will be amended: it should correctly read 0.05 per dwelling.</p>
Whilst the standards for residents' cycles is very high, the requirement for visitors is very low. If, as the SPG hopes, people will increasingly cycle, they need a location to park the cycle at their destination, which may well be a residential property. This includes the Town Centre where zero visitor space is required by the SPG, but provision should be made within schemes rather than rely upon public facilities, which have been provided for other, non-residential, purposes.	Public visitor cycle parking is typically offered in the town centre's public areas, mainly for short-term use. As a result, there is no requirement to provide visitor cycle space in the St Helier town centre STZ (STZ1). For all other parts of the island developments of ten or more homes are required to provide 0.1 visitor cycle parking space per dwelling.
Covered cycle parking: Visitors' covered cycle parking should be encouraged in large developments and with space for adapted and cargo cycles.	<p>The revised draft standards make provision for non-standard cycles. The specifications that are set out in Appendix 2 align with LTN1/20 and best practice. These consider cycles of all sizes. Within communal cycle parking facilities, provision – at the level of five percent - should be made for non-standard bikes (see appendix 2A): adapted cycles, tricycles, cargo-bikes and cycles with trailers.</p> <p>Public visitor cycle parking is typically offered in the town centre's public areas, mainly for short-term use. As a result,</p>

Consultation feedback	Response
	there is no requirement to provide visitor cycle space in the St Helier town centre STZ (STZ1). For all other parts of the island developments of ten or more homes are required to provide 0.1 visitor cycle parking space per dwelling.
Cycle club: Consideration should be for developers to provide a cycle share club facility such as EVie cycle hire and to provide at least 12 months' free membership per occupier which will help encourage cycle usage. The cycle share facility should be inclusive by including adapted and cargo cycles.	<p>The guidance already states that, to encourage a shift to more sustainable modes of transport, support may be given for residential development that does not meet adopted minimum standards, where contributions towards sustainable transport infrastructure or services, is secured, and where it can be demonstrated that any deviation will not lead to problems of indiscriminate parking in the locality.</p> <p>Sustainable transport measures might include, for example, the introduction of some form of shared mobility schemes such as car clubs, pool cars, or cycle hire schemes.</p>
The SPG appears to rely heavily upon an assumption that most journeys are to or from the town, and are made by able bodied people, in a safe environment. However, many journeys are not into or out of town, may require a car to take several passengers such as children, and cannot all be made in good weather or on safe and well-lit roads, cycle routes or footpaths. Many journeys will therefore still realistically need to be made by car, and whilst a car club vehicle or public transport may be a realistic alternative in some cases, these are given little weight in the SPG.	<p>Change</p> <p>The revised draft standards do not preclude car ownership or car use. They set out levels of parking required to support residential development in different parts of the island based on relative accessibility.</p> <p>This guidance is required to be considered in association with policies set out in the bridging Island Plan. Policy TT1 – Integrated safe and inclusive travel which states proposals will be supported where it can be demonstrated that consideration has been given to, and provision made for. the travel needs of children, elderly people and people with sensory or mobility impairments and other forms of disability, as a priority.</p> <p>Policy TT4 clearly states that to encourage a shift to more sustainable modes of transport, support may be given for development that does not meet adopted minimum standards, where contributions towards alternative parking elsewhere, or sustainable transport infrastructure or services, is secured.</p> <p>The guidance further supports this by stating that: planning obligation agreements (POAs) may be similarly used to secure the direct provision of [and/or funding for] additional parking infrastructure, facilities or services that will be required as a result of development. The guidance will be amended to give greater emphasis to shared transport options.</p>
Cycling should be very much encouraged but not made mandatory.	The Sustainable Transport Policy sets out a series of principles to guide the development of a sustainable transport system for Jersey. This includes recognising that fewer motor vehicle journeys will be good for Jersey; and making walking and cycling more attractive.

Consultation feedback	Response
	The provision of cycle parking facilities as part of residential development can help encourage more people to cycle more: it does not mandate it.
Consider combined parking and cycle spaces in residential developments.	<p>The integration of cycle and vehicle parking does not offer the advantages that are available with a dedicated standalone cycle parking facility. These facilities may include enhanced security measures, protection from the elements, and/or easy access.</p> <p>The guidance states that to be effective as a place to park a car (as well as a place for the storage of bicycles), garages will need to be a minimum of 3.0m x 6.0m in internal dimension</p>
Don't really care, I'm not a cycle rider and I never will be.	Shame: there are many benefits to cycling, at both a personal and societal level: Cycling NHS inform

11. Appendix 3B of the draft guidance sets out standards for the provision of motorcycle parking. Please state whether you agree or disagree with the proposed motorcycle parking standards.

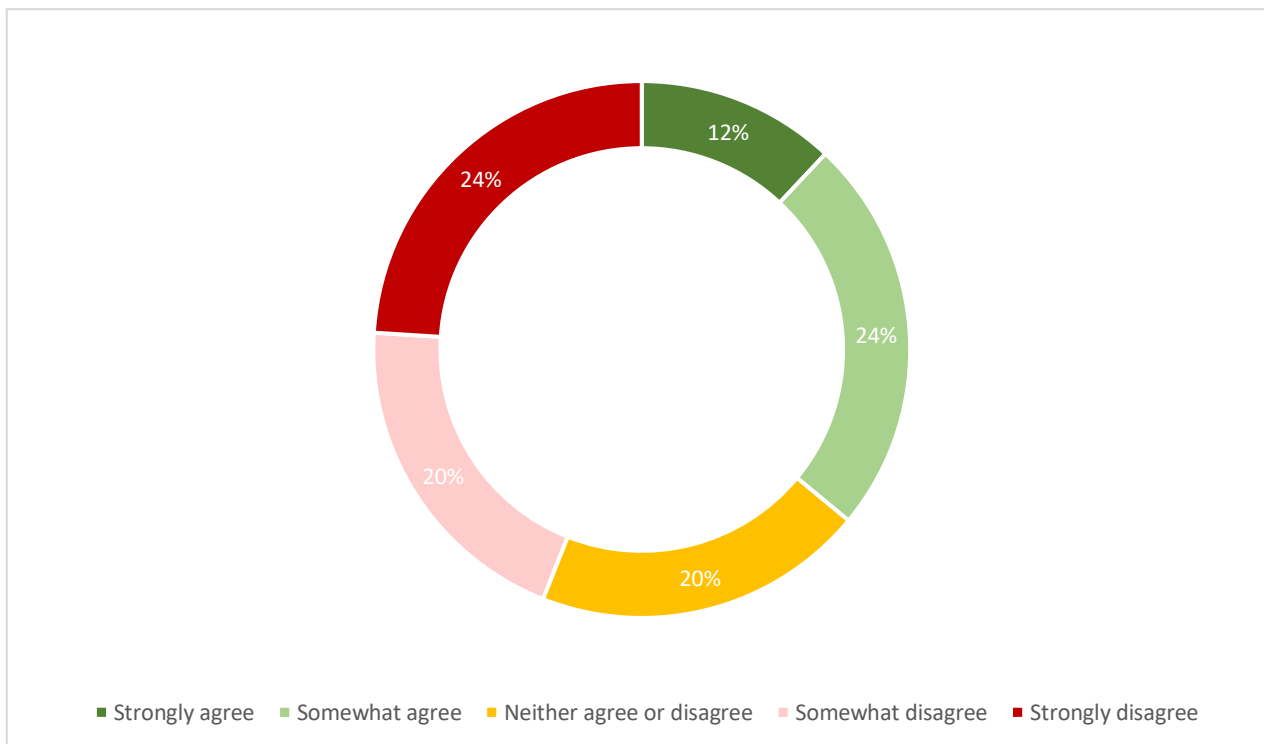


Consultation feedback	Response
Difficult to interpret the table? If there isn't sufficient motorbike parking available, motorists will park their motorbikes in other areas. If the parking isn't secure and the motorbikes get damaged, this spirals into increased work for the police dept/parishes etc..	Noted.
This mode of transport works for many adults and alleviates pressures on car park spaces to a degree	Noted.
The number of motorcycles that aren't used purely for leisure purposes is questionable.	Noted.
More people will be forced to own motorcycles, despite the safety concerns, due to inability to park a car.	Noted.
Motorcycle parking space & Appendix 2B: Specification – motorcycle parking space On-street motorcycle parking bays will often follow a similar layout to car parking bays with the motorcycles parked at right angles to the kerb rather than parallel. To allow flexibility and efficient use of grouped motorcycle parking bays it may be better to use the standard to calculate the overall space required and not prescribe individual markings.	Change Marked spaces have been defined to promote inclusive access to motorcycle parking for people with disabilities. The guidance will, however, be revised to allow more grouped provision to be made, where at least one space is defined.
Motorcycle space requirements are set out but are surprisingly low.	See above.

Consultation feedback	Response
<p>Consideration should be given to making cycling spaces more flexible to allow for motorcycles and mobility scooters.</p>	<p>The provision of dedicated cycle parking space is required to accord with the minimum standards set out in this guidance.</p> <p>Separate provision is required to be made for motorcycle parking.</p> <p>The guidance states that new development that is likely to cater for those making use of a mobility scooter, such as sheltered homes, will be expected to make provision for storage areas and charging points on the ground floor.</p>

12. Appendix 3C of the draft guidance sets out standards for the provision of car parking.

Please state whether you agree or disagree with the proposed standards for the provision of residents' car parking space, set out in table 4.



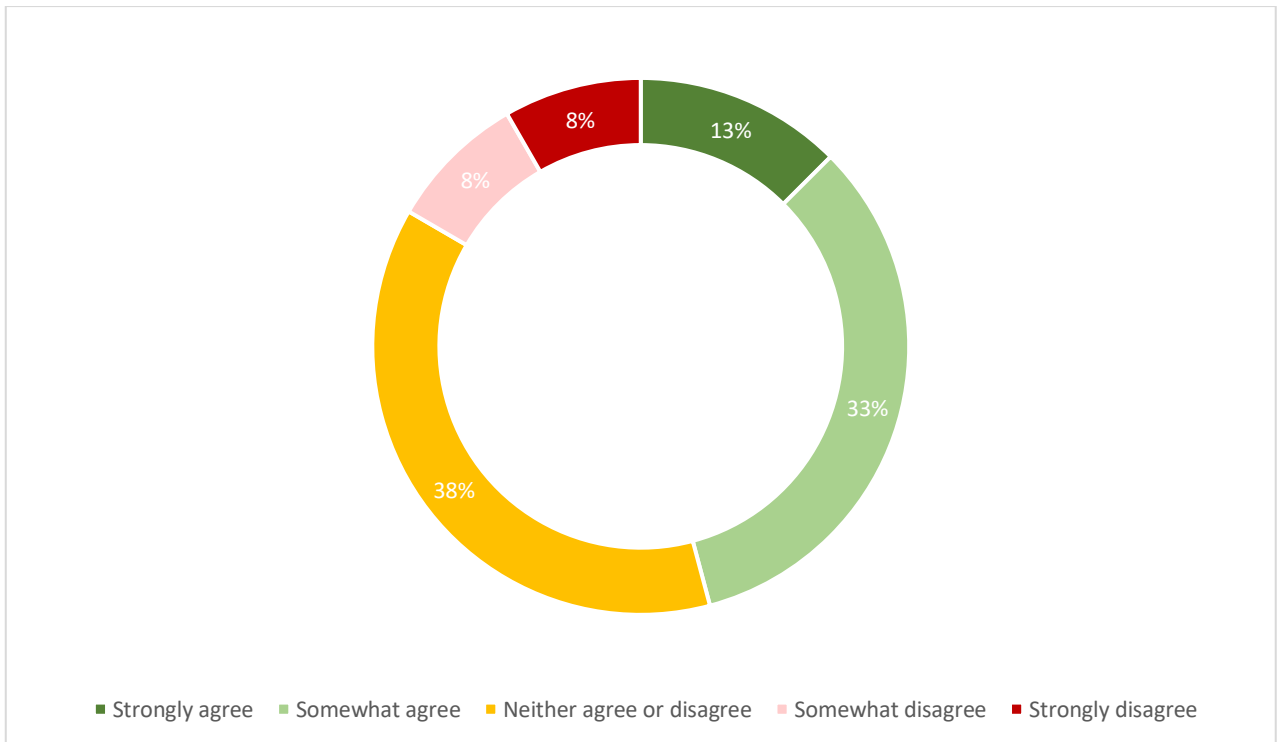
Consultation feedback	Response
<p>Difficult to interpret the table. But there is already an insufficient amount of parking available for residents in st helier, so by populating town more but reducing the proportion of parking even more is going to create more problems for both residents and visitors/workers into town. Waiting lists for carparks in town are evidential of this. And how full all the carparks are everyday also second this.</p>	<p>As the most accessible part of the island, where residents have easier access to goods and services locally and a range of travel choices, it is proposed that levels of residential car parking provision in association with residential development is relatively lower in the Town of St Helier than in other parts of the island.</p> <p>The revised draft standards do not preclude car ownership or car use. They set out levels of car parking required to support residential development in different parts of the island based on relative accessibility and the potential capacity of residential development proposed whilst also seeking to optimise the density of development (see: Consultation on draft planning guidance for the density of residential development (gov.je)); and improve the internal and external spaces of new homes (see: Draft supplementary planning guidance: residential space standards (gov.je)).</p>
<p>St Helier residents: Committee expresses concern that the Policy seems to penalise those residents living in St Helier, as St Helier residents should have the same right as those residents living in rural areas to have access to car parking.</p>	<p>See above.</p>

Consultation feedback	Response
The minimum car parking standards proposed in the Town and Les Quennevais STZ are therefore considered too low	See above. Les Quennevais, like St Helier, enjoys relatively better access to good and services, with greater choice of travel options, than other parts of the island.
Les Quennevais and St Helier outside of town should be at least 1 space per unit (though not necessarily 1 space per bed).	The minimum standard of car parking outside of the Town of St Helier and Les Quennevais is one space per unit, as set out in the draft guidance.
This will punish the poorest islanders.	The revised draft standards do not preclude car ownership or car use. They set out levels of car parking required to support residential development in different parts of the island based on relative accessibility and the potential capacity of residential development proposed whilst also seeking to optimise the density of development (see: Consultation on draft planning guidance for the density of residential development (gov.je)); and improve the internal and external spaces of new homes (see: Draft supplementary planning guidance: residential space standards (gov.je)). Property with less or without parking is likely to be cheaper and more accessible and affordable. New development accounts for a small proportion of the housing market and properties with larger amounts of parking space will remain available.
Woefully low.	Planning guidance for the provision of car parking space in association with all forms of development has been in operation in Jersey since September 1988 and is set out in Parking (planning policy note) (gov.je) . At this time, the transport strategy adopted by the States of Jersey might be described as one of 'car-accommodation' whereby policy sought to make optimal provision for the car. Since the mid-1990s, however, there has been a significant shift in the strategic policy framework for transport in the island. Successive Sustainable Transport Policies have fundamentally altered the policy emphasis from car-accommodation to seeking to reduce the environmental impact of vehicular traffic and the promotion of other more sustainable modes of travel, including walking, cycling and public transport. This presents discord between the policy direction set by the bridging Island Plan, which embodies the objectives of the current Sustainable Transport Policy, and the supplementary planning guidance that is designed to support and complement it. In light of this, there is considered to be an urgent need to review the guidance used to assess planning applications relative to the provision of space for parking, and it is against this background that these revised standards for residential development have been prepared.

Consultation feedback	Response
Everyone in town s as md country must have adequate parking provision whether it be for the ICE, electric or hydrogen or whatever comes next	See above.
<p>As a practice we have been involved in a good number of residential refurbishment and change of use schemes in the past, and the future guidance needs to reflect a more flexible approach in some circumstances where existing buildings need to be adapted to meet current living standards.</p> <p>There are many conflicting controls and measures in place for the reuse of existing buildings particularly in St Helier, these are somewhat counterintuitive in some circumstances to the BIP's drive to focus development within the BUA and St Helier in particular.</p> <p>There is a significant resource of existing property that requires to be modernised within St Helier, it does and will continue to form a significant proportion of future development and meet a proportion of the housing delivery.</p>	<p>Policy TT4 clearly states that to encourage a shift to more sustainable modes of transport, support may be given for development that does not meet adopted minimum standards, where contributions towards alternative parking elsewhere, or sustainable transport infrastructure or services, is secured.</p> <p>The guidance further supports this by stating that: planning obligation agreements (POAs) may be similarly used to secure the direct provision of [and/or funding for] additional parking infrastructure, facilities or services that will be required as a result of development.</p> <p>Change</p> <p>The guidance will be revised to provide explicit acknowledgement of the potential for car-free residential development to occur when existing office buildings are converted to residential use and here there exists no on-site parking provision.</p>
<p>It is understood that outside the Town Centre, the standards set are minimum levels, and therefore in areas where we consider the draft standards to be too low, developers could provide more, but this raises two concerns.</p> <p>First, some developers will adopt the lowest, (and cheapest), standard without any concern for the long term implications of this, such as indiscriminate parking, which will impact on existing residents and other future developments. On the other hand, some may seek to provide too much.</p> <p>Given that the aim is to reduce car usage, it would be logical to set a maximum standard as well as a minimum, and to only deviate in truly exceptional circumstances. For example, in the Accessible Local Centres, the standard for a 2 bedroom unit could be set at 1-2 spaces, with justification required for providing more or less.</p>	<p>The limited capacity and constrained nature of the town centre road network, coupled with the objective of seeking to reduce the impact of vehicles on our townscape, justifies the adoption of maximum standards of parking provision within the town centre sustainable transport zone (STZ1).</p> <p>It is not currently considered that maximum parking standards are currently justified elsewhere in the island, but this guidance and its operation will be kept under review.</p>
<p>Paragraph 3.1.1 says that support may be given for providing less parking "where contributions towards sustainable transport infrastructure and services, is secured, and where it can be demonstrated that any deviation will not lead to problems of indiscriminate parking in the locality."</p> <p>In reality it is impossible to demonstrate the latter, and the former is too imprecise. It would be clearer to both applicants and decision makers if the SPG said that the requirement is for X no. car parking spaces and Y no. cycle/motorcycle/scooter spaces, plus a set financial contribution per unit for walking, cycling, a car club vehicle</p>	<p>The parking standards set out in this document represent supplementary planning guidance and need to be used and applied appropriately. There will always be situations where guidance will need to be applied pragmatically and where applicants can provide a sufficient justification for varying levels of provision relative to the specific circumstances of a site. In such circumstances, the guidance can provide a basis upon which contributions to alternative forms of sustainable transport infrastructure might be made.</p>

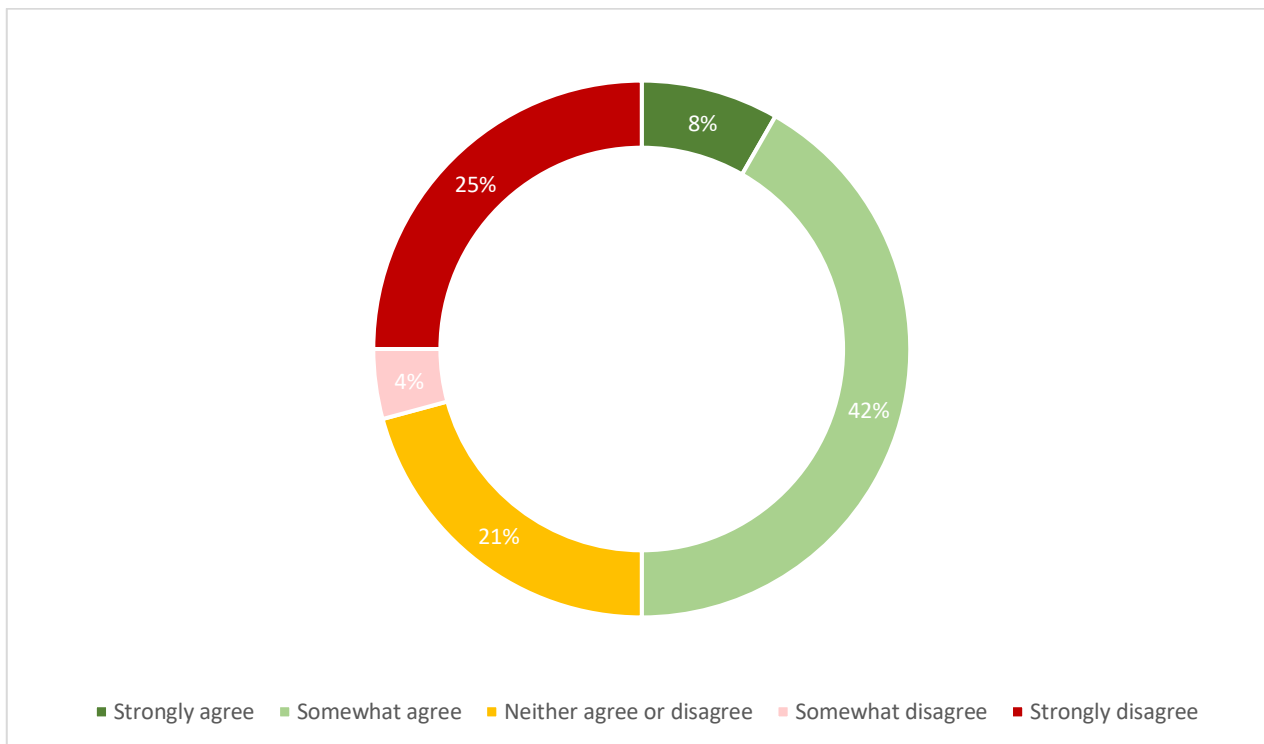
Consultation feedback	Response
(which may not be on site), and/or public transport, and that a reduction in car or cycle parking will be genuinely exceptional, and require special justification, and potentially an increase in the financial contribution.	
<p>In relation to Appendix 3C and the car parking standards, these appear reasonable (with the exception of HMO's – whatever they are?) but are a VERY long way from what the Planning Committee have considered to be acceptable in recent determinations (see, for example, P/2021/1782) and the position of this key group of decision-makers must be obtained ahead of these Standards being progressed to adoption.</p>	<p>The Minister for the Environment adopts and publishes supplementary guidance. Once adopted, SPG becomes material to planning decisions and decision-makers, including the Planning Committee, are required to have regard to it.</p> <p>All States members, including members of the Planning Committee, have been engaged in the development of guidance.</p> <p>Similarly, the Sustainable transport policy has been approved by the States Assembly.</p>
<p>Residential parking standards</p> <p>A reduction in available parking spaces within the STZ may limit the availability of EV charging for those without a designated parking space where they live. Home owners, in St Helier, with an EV will need somewhere to park and charge, if they choose to own a vehicle.</p> <p>We are therefore supportive of the draft standards, however, the provision of a robust electric vehicle charging infrastructure, both at home and in the public domains is pivotal to achieving this aim.</p>	<p>These parking standards provide guidance about the level and type of parking that should be provided off-street in association with residential development. This includes the proposed requirement for electric vehicle charging infrastructure.</p> <p>It is recognised, however, that in addition to the provision of infrastructure that is provided in association with existing and new development, there will be a need for other public electric vehicle infrastructure. This is specifically identified in the Carbon Neutral Roadmap where one of the objectives is as follows:</p> <p><i>TR1 Speeding up adoption of electric vehicles.</i></p> <p><i>The Government of Jersey will work with Jersey Electricity to agree a scale-up plan for electric vehicle charging infrastructure that:</i></p> <ul style="list-style-type: none"> • <i>subsidises the cost of domestic electric charging infrastructure,</i> • <i>continues to deliver off-street electric vehicle charging points across the Island</i> • <i>trials on-street charging infrastructure to identify the right solution for Jersey, including exploring consequential amendments to planning regulation where appropriate</i> • <i>improves the visibility of charger availability across the Island.</i> <p>Work to deliver against this objective is underway.</p>
<p>Appendix 3C restricts the provision of on-site parking by limiting the number of parking spaces, and therefore reduces the number of on-site EVCP's.</p> <p>Provision should be made in the Sustainable Transport Zones for additional EV charging facilities, where on-site parking/charging is reduced. This could be linked to any relevant POA.</p>	<p>See above.</p>

13. Please state whether you agree or disagree with the proposed standards for the provision of visitors' car parking space, set out in appendix 3C, table 5.



Consultation feedback	Response
<p>Visitor spaces should correspond, with higher requirements in less accessible areas, and at least 0.2 spaces per unit outside the Town Centre.</p> <p>Visitor parking should be provided on all schemes of 5 or more dwellings.</p>	<p>Standards for visitor parking do correspond, with higher requirements in less accessible areas.</p> <p>They are, however, set a 1 space per 10 homes in the Town of St Helier and Les Quennevais (STZ2-3) and at 1 space per 5 homes for the remainder of the island (STZ4-6).</p>
<p>Visitor spaces are already used as permanent spaces on estates by families with more cars than spaces. Many use the allocated visitor spaces for their own cars so they leave a visitor space on their properties for their visitors. As there are too few spaces who can blame them?</p>	<p>Visitor parking is generally best served by unallocated parking which allows for changes in car ownership between individual dwellings over time and provides for both residents' and visitors' needs.</p>

14. Please state whether you agree or disagree with the proposed standards for the provision of car parking space for shared residential accommodation, set out in appendix 3C, table 6.



Consultation feedback	Response
I disagree with a 'maximum' provision for Les Quennevais. For a home with 20 bedrooms, you can't have more than 2 spaces in Les Q, but just outside it you need to have at least 5 spaces? That doesn't make any sense whatsoever!	The revised draft standards set out levels of car parking required to support residential development in different parts of the island based on relative accessibility. Les Quennevais is relatively more accessible than the areas outside it which is why there is a lower level of provision within the defined Les Quennevais STZ (STZ3).
Woefully inadequate.	<p>Planning guidance for the provision of car parking space in association with all forms of development has been in operation in Jersey since September 1988 and is set out in Parking (planning policy note) (gov.je). At this time, the transport strategy adopted by the States of Jersey might be described as one of 'car-accommodation' whereby policy sought to make optimal provision for the car.</p> <p>Since the mid-1990s, however, there has been a significant shift in the strategic policy framework for transport in the island. Successive Sustainable Transport Policies have fundamentally altered the policy emphasis from car-accommodation to seeking to reduce the environmental impact of vehicular traffic and the promotion of other more sustainable modes of travel, including walking, cycling and public transport.</p>

Consultation feedback	Response
	<p>This presents discord between the policy direction set by the bridging Island Plan, which embodies the objectives of the current Sustainable Transport Policy, and the supplementary planning guidance that is designed to support and complement it.</p> <p>In light of this, there is considered to be an urgent need to review the guidance used to assess planning applications relative to the provision of space for parking, and it is against this background that these revised standards for residential development have been prepared.</p>
<p>HMO Standards in Appendix 3C should accord with the standards per bedroom of other accommodation, and not be solely for developments of 6 or more bedrooms.</p>	<p>The island's agricultural, tourism and construction industries are particularly reliant on the provision of accommodation to house staff, particularly migrant workers. This may be provided in the form of dedicated staff accommodation or lodging houses.</p> <p>All islanders should be adequately housed. Where staff or lodging house accommodation is provided to be occupied for short, time-limited periods tied to a specific employment need greater flexibility may be adopted in terms of the minimum standards of residential accommodation to be provided and the revised standards reflect this greater flexibility.</p>
<p>We need to discourage HMO. It is not good for families, only transient workers or becomes a financial trap for those on lower salaries</p>	<p>See above.</p>
<p>The definitions of residential development include (at 3.2.1) reference to Lodging Houses. This is also included in the Glossary, however the terminology is inadequate and does not reflect what a 'Lodging House' is in the context of the Planning Law and Island Plan. It is a term used by the Population Office (as it was known) under legislation entirely separate to the Planning Law.</p> <p>Lodging House accommodation is required by to have minimum levels of amenities which do not align with the requirements set by the planning system.</p> <p>When such accommodation is self-contained then it is (as a matter of fact) a residential unit for Planning and Bye-Law purposes. However, whilst individual cooking facilities have to be provided, bathrooms may be shared, so the units might not be self-contained. The standard of accommodation can be significantly lower than would be agreed by reference to planning standards, but they seem to exist in an un-connected parallel area.</p> <p>Regulatory regimes should be synchronised, particularly as the Minister for the Environment has also issued draft Supplementary Planning Guidance on Residential Space Standards for consultation.</p>	<p>Both this supplementary planning guidance, and that related to residential space standards, seek to provide guidance as it may affect and be material to decisions made under the Planning and Building (Jersey) Law.</p>

Consultation feedback	Response
<p>It would however be useful for further clarification on standards for Homes in Multiple Occupation (HMO's) and the future classification for Lodging Accommodation.</p> <p>There appears to be a clear necessity for further clarification of these use types and their requirements for both parking and residential space standards that would seek an alignment with other parallel regulation controls.</p> <p>Given the current 'cost of living crisis' and the longstanding awareness of high property pricing in Jersey, we need to obtain clearer guidance on these types of accommodation options and how these could be potentially updated for modern living and thus figure as part of the solution to achieve affordability of accommodation for Islanders.</p>	<p>See above.</p>
<p>The draft SPG also introduces the term "Houses in Multiple Occupation" seemingly for the first time in the Jersey planning system. There seems to be no basis in policy for this 'new' form of accommodation. The same terminology appears in the glossary for the draft SPG on Residential Space Standards, without any explanation as to what standards might apply to such accommodation. This terminology is repeated at 5.1.2.</p> <p>Are HMO's now an accepted part of the Jersey housing market, capable of being endorsed through the planning system?</p>	<p>The term is adequately described in the glossary. It should not be misconstrued or conflated with the definition of the same derived from other planning systems.</p>
<p>This is a discussion that needed to be had years ago so good to see this being tabled now. The policy needs to address also the increasing number of HMO's in St Helier, which is making the concentration risk worse. Other parts of the Island do not seem to take their fair share of new homes, and the socio-demographic is also not in balance.</p>	<p>The guidance is focused on the establishment of parking standards for this form of residential development.</p>

15. Would you like to add anything else?

Consultation feedback	Response
Please consider creating a resident only car-park in central town. I envision this to be underground parking to minimise the impact on towns skyline etc.	The revised draft standards relate to the level of parking provided on-site as part of new residential development only.
Please just take a minute to think about how a person's life can change so quickly. It doesn't matter if they live in a house, flat or shared accommodation. When you suddenly become ill and rely on others to help you. You need access to a car or a parking space. It's critical if you don't live near any shops you can walk to and can't walk any longer than 15 minutes and can't walk up a hill.	This guidance is required to be considered in association with policies set out in the bridging Island Plan. Policy TT1 – Integrated safe and inclusive travel states proposals will be supported where it can be demonstrated that consideration has been given to, and provision made for. the travel needs of children, elderly people and people with sensory or mobility impairments and other forms of disability, as a priority.
Rather than focusing time and energy on consultations and work projects like this, focus on what really needs to be done, i.e. limiting the amount of people moving to and living in St Helier and Jersey as a whole, thus reducing traffic on roads.	<p>The Sustainable Transport Policy (gov.je), sets out a series of principles to guide the development of a sustainable transport system for Jersey of the population of the island that is already here, as well as planning for the future.</p> <p>It includes recognising that fewer motor vehicle journeys will be good for Jersey; and making walking and cycling more attractive.</p> <p>The revised draft guidance on parking standards seeks to reduce space available for car parking provision whilst increasing the space available for cycle parking provision to help deliver against these objectives.</p>
If more buildings were built with sensible in-house parking, there will be less vehicles looking to park on the streets. Win win.	<p>The Sustainable Transport Policy (gov.je), which has been approved by the States Assembly, sets out a series of principles to guide the development of a sustainable transport system for Jersey, many of which are directly relevant to the planning system including the need to:</p> <ol style="list-style-type: none"> 1. recognise that fewer motor vehicle journeys will be good for Jersey 7. reduce the impact of vehicles on our landscape and create more space for people in St Helier 8. create planning systems that reduce the need to travel <p>The revised draft guidance on parking standards seeks to reduce space available for car parking provision whilst increasing the space available for cycle parking provision to help deliver against these objectives.</p>
In winter few people cycle. In winter it can be difficult to walk to bus stop or bus station. The St Helier commercial centre is competing with the internet - and losing as the internet becomes more convenient. The wealthy are not affected by these types of schemes. They can still park right outside their house, they simply pay any congestion or other charges, if we move to electric cars then no problem. People still need cars - to work, to visit people, to see the Island. Even the keen cyclists don't cycle in winter months. The policies seem to work against the majority, favouring a minority that don't care if the plasterer cannot get to work,	See above

Consultation feedback	Response
<p>the disabled person cannot get out, or the mother cannot take her three young children to the beach. Limiting people's freedom is selfish.</p> <p>Closing Broad Street (except for taxis to pick up civil servants) was selfish. Destroying St Helier as a commercial centre due to belief in some type of utopia is just stupid. I realise this comment won't have any impact because of a form of delusion. But the Government is moving a lot of health services to the West of the Island. How does this affect those forced to give up the freedom that a car gives them? Where is this joined up Government? Why is it always those that can least afford it that get hit by the ramifications of policies such as these?</p>	
<p>As stated before, this policy needs to address the backlog of mistakes by allowing building in St Helier without paying due regard to the needs of people for a parking space. Please address</p>	<p>The revised draft standards set out levels of car parking required to support new residential development only.</p>
<p>Maybe a general rule that parking minimums don't count anywhere within 5 mins walk distance of a 15 minute frequency bus route or 20 minutes walk of the town terminus. And parking maximums do not count anywhere without having BOTH a safe cycle route access AND a minimum 15 minute frequency bus route within a 5 mins walking distance.</p>	<p>The revised draft standards set out levels of car parking required to support residential development in different parts of the island based on relative accessibility.</p> <p>The sustainable transport zones, as currently defined, relate to distinct parts of the island's built-up area, as defined in the bridging Island Plan. The standards and the areas to which they apply, once adopted, will be kept under review.</p>
<p>There must be maximum car parking standards for other areas. Why is it that if you live outside of town you can have a property with 15 parking spaces. Where as if you live In Town you have to get a bus everywhere. Prior to this being introduced a greater access to the countryside for St Helier residents is needed (eg grand Vaux valley). A maximum amount of cars for developments outside of town must be introduced at 3 per dwelling.</p>	<p>The limited capacity and constrained nature of the town centre road network, coupled with the objective of seeking to reduce the impact of vehicles on our townscape, justifies the adoption of maximum standards of parking provision within the town centre sustainable transport zone.</p> <p>It is not currently considered that maximum parking standards are currently justified elsewhere in the island, but this guidance and its operation will be kept under review.</p> <p>The adoption of minimum Density standards (gov.je), applicable to development schemes of five or more homes, will encourage the optimum use of land throughout the island's built-up area.</p>
<p>Provision for drying rooms should be considered for motor cycle and cyclists to use to hang their wet clothes or to dry down their machines.</p>	<p>The revised draft standards set out levels of car parking required to support new residential development only.</p> <p>Revised parking standards for other forms of development, where it is more appropriate for other facilities to be provided in association with the provision of cycle parking, will be provided in due course.</p>
<p>Commercial cycles: All commercial developments should include sufficient cycle parking facilities and changing room facilities for staff which include shower facilities. The developer should provide secure and safe cycle parking</p>	<p>See above.</p>

Consultation feedback	Response
facilities for their staff/users of their building. There should also be sufficient visitor/customer cycle parking provided.	
<p>The final paragraph of 3.2.1 confirms that the Standards would only relate to the residential element of mixed-use schemes. Proposal 33 of the Island Plan refers to all forms of development, and if the draft guidance is to supersede PPN3, then what is the position of the Minister in relation to the other range of uses beyond residential?</p> <p>There would appear to be a void, with (for example) no information on the amount of cycle parking that would be required in a new office. This guidance would seem to be important in relation to actually changing behaviours, and encouraging the use of bicycles, as it represents the 'other end' of a journey from a home. A bicycle is unlikely to be used if there are inadequate facilities at the destination.</p>	See above.
<p>Is there further planning guidance expected regarding the following:</p> <ul style="list-style-type: none"> • Electric Vehicles (EVs), e-scooters, and e-bikes. • Integration of 'cycle hubs,' and to areas outside of St Helier. • Mobility scooters and powered wheelchairs. • Hydrogen fuel cell vehicles. • Residential institutions (Schedule 2, Class J) 	<p>See above.</p> <p>This guidance already makes reference to the provision of electric vehicle charging infrastructure and mobility scooters.</p>
please can you advise if there will be another SPG covering commercial parking standards, or going forward are these to be negotiated with Planning on a case-by-case basis?	See above.
Will you be undertaking a similar survey for commercial and schools? The provision of cycle parking in schools is generally terrible. School kids would love to cycle to school and gain their independence. Safe, secure, covered cycle parking should be provided. st Martins is a recent development but the Sheffield stands out front have no protection from the elements.	<p>See above.</p> <p>School Travel Plans help to establish existing conditions related to travel and transport as well as current travel patterns. Surveys have been completed in a number of schools in the island to determine how children travel to school. In addition to this, staff surveys have also been undertaken.</p> <p>Consequently, these surveys frequently highlight challenges and opportunities that are presented.</p> <p>The Government of Jersey acknowledges that the lack of cycle parking facilities can restrict the option to travel actively to school and are collaborating with schools to address these concerns.</p>
Perhaps the States members and proposers of this policy should have a few months without their cars to see what the actual situation is.	<p>The guidance does not preclude car use or car ownership.</p> <p>A number of States Members commute by bike, including the Minister for the Environment.</p>
I have real concern regarding EV's and current Building Regulations which haven't updated to suit the trend of EV's and their potential for thermal runaway. I hope plans are a foot to take this risk into account. I don't believe EV's are	<p>Change</p> <p>Empirical evidence relating to electric vehicles (EVs) is evolving rapidly as the EV industry is comparatively young (around 12 years old) in comparison with the internal</p>

Consultation feedback	Response
<p>any more likely to ignite than petrol however the consequences when it happens are terrifying.</p>	<p>combustion engine vehicle (ICEV) industry (around 150 years).</p> <p>There are concerns over potential increases in fire severity, duration and frequency associated with the increased use of electric cars and vehicle charging equipment within car parking facilities. However, it remains uncertain whether the increase in electric vehicles and charging equipment will notably increase the fire risk and/or frequency.</p> <p>The emerging risk and increased use of electric vehicles and associated charging equipment has led to a need for guidance on management of the associated risks, but consistent guidance, regulations and legislation are not yet in place.</p> <p>Changes will be made to the guidance to identify potential measures to mitigate risk related to EVCPs in covered parking spaces. Further work is required, outside the scope of this planning guidance, to consider potential change to building bye-laws.</p>
<p>My concern is that EV is being pushed without any thoughts to safety or awareness of the risks EV fires pose. EV's are no more likely to catch fire than a petrol vehicle yet when one does we are grossly under prepared.</p>	<p>See above.</p>
<p>I am interested to know if there has been any consultation with the public to inform the development of these proposals. Whilst I understand the thinking behind limiting car parking spaces generally, and specifically in urban and semi-urban areas, it seems to me, on the basis of personal experience, that there is a real problem with parking in such areas. Minden Place car park (for instance) is usually completely full outside of work hours for instance, often with a large proportion of commercial vehicles</p> <p>Whilst the intention of the Government is to discourage car and vehicle use, there remains, and will remain for a very long time, a large section of the population who absolutely need vehicles for work, and such need is often concentrated in urban areas. Has this been take into account? It appears to me that there are currently problems of "indiscriminate parking" in certain localities – a situation which the SPG notes as a problem to be avoided (3.11, p3.).</p>	<p>Consultation is being undertaken in relation to the draft standards, as is evident by the opportunity to make comment on them.</p> <p>There is no differentiation about the use of public car parks for the parking of cars or vans, subject to width and height restrictions (which is at a maximum of 6'4" and 1.93m for Pier Road MSCP; and 6'6" and 1.98m for most other MSCPs; with none applying to surface level car parks). There is general availability of parking space overnight in St Helier's public car parks.</p>
<p>As I have often noted, the drive to reduce car ownership would be much better served if the bus service were to be significantly enhanced, in particular by the introduction of a an Island circular route.</p>	<p>To enable and encourage people to use the bus instead of their own vehicle additional services across the island to support the choice to switch to public transport are being explored. Five trials have already started and work is ongoing to identify opportunities where better provision of buses can be realised to enhance the service on new or existing routes.</p> <p>This work forms part of the Bus development plan that is being progressed as part of the Sustainable transport policy.</p>

Consultation feedback	Response
<p>Space standards need a proviso for starter homes - i.e. 50% reduction to make them affordable, otherwise the poverty gap is just continuing to grow!</p>	<p>The revised draft standards set out levels of car parking required to support residential development in different parts of the island based on relative accessibility and the potential capacity of residential development proposed whilst also seeking to optimise the density of development (see: Consultation on draft planning guidance for the density of residential development (gov.je)); and improve the internal and external spaces of new homes (see: Draft supplementary planning guidance: residential space standards (gov.je)).</p> <p>The revised standards generally seek to reduce the levels of car parking provision required to be made in association with the provision of new homes, including the potential for car-free development.</p>
<p>It is vital that this guidance has engaged the commitment of the 12 parish highway authorities alongside that of the Transport section of IHE. It is important that we have a consistent basis for analysis and comment on future applications across the differing areas of the Island. We have in the past experienced conflicting requirements on application projects that have been difficult to resolve. It is only through a cohesive framework that the parties responsible for implementation will deliver a consistent approach and clarity in the future application process.</p>	<p>The Minister for the Environment adopts and publishes supplementary guidance. Once adopted, SPG becomes material to planning decisions.</p> <p>All States members, including the Connétables as heads of parish roads committees, have been engaged in the development of guidance.</p> <p>The guidance explicitly states that it has been prepared following engagement with the Department of Infrastructure, Housing and Environment (Transport and Operations). This also applies to any potential change to the draft guidance following consideration of consultation feedback.</p>
<p>The introductory section confirms that engagement has occurred with the Transport section of I&E. Please can you confirm that the Planning Committee, Development Control section of I&E and the 12 other Highway Authorities have been involved with the production of this guidance too? if so, please make their comments available (as they will also be responsible for its implementation).</p>	<p>See above.</p>
<p>Please can you confirm whether the Jersey Architecture Commission have been asked for comment on this document? It is apparent that the Commissioners have their own views on sustainable transport and car parking that might be usefully incorporated as part of the SPG and so be formalised as the position of the Minister too.</p>	<p>The Minister for the Environment adopts and publishes supplementary guidance. Once adopted, SPG becomes material to planning decisions.</p> <p>The JAC has been engaged as part of the preparation of the draft guidance.</p>
<p>Parking strategy for the island: Committee requests that the Parking strategy for the island is first undertaken before the implementation of the proposed new Parking standards.</p>	<p>This matter has been considered and rejected by the States Assembly (see: Votes (gov.je))</p>
<p>Cycle network: We suggest that large developments of 6 or more units of accommodation need to contribute a sum of money to extend the public cycle networks and provide ways to link their development to the cycle network wherever possible. The funding should also be earmarked for provision for covered public cycle stands.</p>	<p>Bridging island Plan Policy TT2 – Active travel requires development proposals to deliver or contribute to improvements to the strategic and local walking and cycle network, where they are related to it.</p>

Consultation feedback	Response
<p>The exponential increase in bicycle provision is not accompanied by measures to make cycling in Jersey safer- where are the cycle lanes etc?</p>	<p>Work has been undertaken within the ring road of St Helier to create a mobility plan. The plan will identify schemes which can be delivered to make the ring road more accommodating for cycling and walking and reduce the difficulty in crossing the ring road for those travelling into town by these modes, and for residents and town users who want to cycle or walk around the town on less congested roads.</p> <p>As part of the work being undertaken in support of the Sustainable transport policy, strategic corridors for cycling across the island have been identified and audited using best practice route selection tools to ensure a consistency of approach.</p> <p>Investment is to be made in this infrastructure to create an island-wide strategic cycling and walking network.</p>
<p>3.5 Planning conditions and obligations</p> <p>Background - The current state of play</p> <p>Currently, in support of government's sustainability objectives, POAs require developers either:</p> <ul style="list-style-type: none"> ● to reserve a specified number of parking spaces (typically 1-3) per development and make these spaces available for shared transport car clubs. This is a "good thing", but falls short of what is needed to make the POAs workable and able to deliver on the government's intended sustainability, carbon neutral, transport and parking ambitions. or more recently ● to pay for residents' membership to shared transport clubs. <p>In order for regulations to work effectively, they have to take account of the motivations of all of the stakeholders. In terms of POAs that require developers to incorporate shared mobility into their developments, it has to be recognised that while they welcome the reduction in space given over to parking as a whole, developers have no economic interest in i) car clubs, ii) encouraging the migration to electric transport, iii) promoting active travel, iv) having any ongoing POA obligations once units have been sold and management of the development has passed to resident associations.</p> <p>Parking spaces sell privately today at between £50- £75k (the last parking space at Horizon by SoJDC sold for £75k). Developers see any parking space set aside for car clubs to satisfy POAs as lost revenue.</p> <p>And, due to scarcity of land resources, brownfield development is becoming increasingly important in meeting the island's need for additional housing. Not all brownfield sites have scope for parking.</p> <p>Through POAs, all developers (zero parking brownfield sites included) could and should be contributing towards</p>	<p>Change</p> <p>POAs need to be necessary to make the development acceptable in planning terms, meeting the objectives of the Island Plan; directly related to the development; and fairly and reasonably related in scale and kind to the development.</p> <p>Bridging Island Plan Policy TT4 clearly states that to encourage a shift to more sustainable modes of transport, support may be given for development that does not meet adopted minimum standards, where contributions towards alternative parking elsewhere, or sustainable transport infrastructure or services, is secured. Any such contribution would need to be secured through a planning obligation agreement.</p> <p>The guidance further supports this by stating that: planning obligation agreements (POAs) may be similarly used to secure the direct provision of [and/or funding for] additional parking infrastructure, facilities or services that will be required as a result of development.</p> <p>In such circumstances, therefore, POAs might be used to give the residents of a new development access to shared mobility transport options, which could be at a shared transport hub. There would be a need, however, to demonstrate that the provision of any such facility was accessible and easy to use for residents in terms of the proximity of the facility and the availability of vehicles that might be used by residents of that development.</p> <p>The guidance will be amended to give greater emphasis to shared transport options and to acknowledge that this provision might be off-site. There would be a need, however, to demonstrate that the provision of any such facility was accessible and easy to use for residents in terms of the proximity of the facility and the availability of vehicles that might be used by residents of that development.</p>

Consultation feedback	Response
<p>the government's zero emissions, parking and sustainable travel ambitions.</p> <p>JEVCo, currently the sole provider of shared car, vans, cargo bikes and dockless bikes in Jersey, does not have a business case to provide car club vehicles where those vehicles are difficult to access: below ground and/or for the reserved and exclusive use of occupiers of a development. The economics do not work except under conditions of exceptional scale (e.g. SoJDC's proposed Southwest St Helier Development of 1,100 units). Therefore, as there are no other providers of shared electric vehicles in Jersey, POAs requiring developers to set aside parking spaces for car share clubs in their developments are undeliverable.</p> <p>We believe that, through modification of POAs, there is a solution to the issues which can be resolved by Shared Transport Hubs.</p> <p>Working in partnership with Andium, JEVCo is developing a number of Shared Transport Hubs (see above) on existing parking. The locations of these Hubs are chosen to be within 3-4 minutes walk of most developments in STZs. The roll out of the Hubs locations is in line with the government's STZ prioritisation.</p> <p>Proposed modifications to POAs.</p> <p>Where POAs concern shared transport car clubs they should:</p> <ul style="list-style-type: none"> ● General: <p>Be tripartite, to include the car club operator in the obligations alongside the developer and government. Without including the car club operator, it is too easy for POAs to fall away: the developer has no interest in the car club's existence nor obligations to residents following sale of units.</p> ● Developer to: <ol style="list-style-type: none"> 1. Contract with a car club operator before or at the time planning permission is granted. 2. Either <p>Buy car club membership on behalf of all units covering a minimum one year and a maximum three year term.</p> <p>Or</p> <p>Contribute a fee equal to the total market value of car parking space(s) that would be set aside for car clubs under current POA guidelines. The value of car spaces will depend on the location of the development and the fee per car space should be determined by the price at which the developer intends to sell the first space in that development on the open market.</p> 3. Any such fees to be payable by the developer to the car club 	

Consultation feedback	Response
<p>operator within six months of the first unit being made available for sale.</p> <ul style="list-style-type: none"> • Zero parking & brownfield sites <p>To allow a greater use of brownfield sites, but still require developers to contribute to the government's sustainability objectives, POAs should require developers of zero parking brownfield sites to contribute as suggested above.</p> <ul style="list-style-type: none"> • Car club operator to: <ol style="list-style-type: none"> 1. Provide all residents of that development with membership to a shared mobility club. 2. Using revenue provided by the developer, to increase the number of cars available in its shared fleet. 3. Specify the length of contract for the provision of residents rights to membership. <p>Effects of modifications to POAs:</p> <ul style="list-style-type: none"> • Developer: Financial obligations are clearly defined, deliverable, ringfenced, directly attributable and, most importantly, verifiable. <p>Costs of meeting the obligations are not passed on to the residents association.</p> <p>Can sell parking spaces which would otherwise be ringfenced for car clubs at market rate, offsetting their financial obligations to shared transport.</p> <p>Model works for brownfield developments where zero parking is available.</p> <ul style="list-style-type: none"> • Occupiers <p>Have access to a far larger fleet of shared electric vehicles located at a Shared Transport Hub within easy reach of home. The larger fleet size, deployed en masse in a shared transport hub, increases the availability of vehicles at any given time.</p> <ul style="list-style-type: none"> • Car Club operator <p>Has a workable business case to increase the fleet size for the benefit of all and help the government address many of its parking and sustainability objectives.</p>	
<p>Public Realm cycle parking: As part of a POA, developers should contribute to the provision of public cycle parking stands as part of their contribution to improving the public realm, such as providing parklets and planters incorporating cycle parking as per the below example.</p>	<p>POAs need to be necessary to make the development acceptable in planning terms, meeting the objectives of the Island Plan; directly related to the development; and fairly and reasonably related in scale and kind to the development.</p> <p>Policy TT4 clearly states that to encourage a shift to more sustainable modes of transport, support may be given for development that does not meet adopted minimum standards, where contributions towards alternative parking elsewhere, or sustainable transport infrastructure or services, is secured. Any such contribution would need to be secured through a planning obligation agreement.</p>

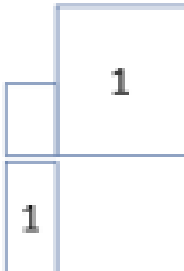
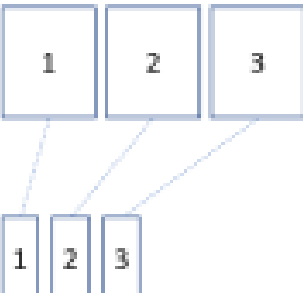
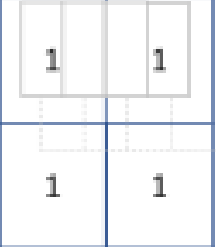
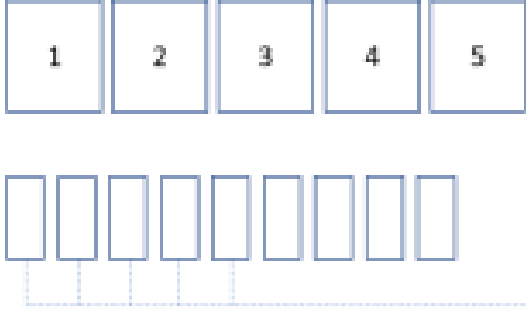
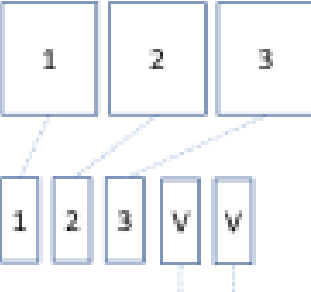
Consultation feedback	Response
	<p>The guidance further supports this by stating that: planning obligation agreements (POAs) may be similarly used to secure the direct provision of [and/or funding for] additional parking infrastructure, facilities or services that will be required as a result of development</p>
<p>We need to review the Parking Standards SPG, my biggest concern is that with the best intentions, it creates way too much competition for the ground floor plane to accommodate the larger and new variety of transportation storage and facilities. This will result in less new homes (an unexpected outcome, I suspect, given our housing crisis) which will be more expensive (also problematic in relation to the affordability conundrum outlined above) and ultimately therefore lead to inefficient land use (contrary to the BIP).</p> <p>Agents are now getting to grips with the spatial implications of this SPG and it is highlighting these problems/challenges, so I hope that the SPG expectations might be tempered in some way?</p> <p>Certainly the rezone site work will inform this, but there also needs to be some reciprocal spatial analysis work in the BUA, otherwise we might end up with schemes that dig basements to accommodate cargo bikes!</p>	<p>The Minister is revising and issuing guidance that deals with all key aspects of residential development, including density; residential space standards; and residential parking standards.</p> <p>As part of the consultation response to draft guidance, the Minister is reflecting upon and responding to the issues raised in revised guidance.</p> <p>The combined effect of all of this revised guidance should help to promote viability and deliver more and better residential accommodation on development sites.</p>
<p>Attached table (see appendix B of this consultation response) demonstrating how land-hungry the combines SPG's are, in particular the competing ground floor proposed requirements for share open space and cycle parking. For a lot of sites this will either stifle developments completely or reduce numbers and drive prices up even higher. These impacts are too onerous and should be reduced or part of an incremental series of requirements, to allow the market to adjust and for a period of review- for example the extent to which more bicycle stores will lead to more people cycling? An SPG which has the effect of reducing the clear intention of the BIP to provide seems counter-intuitive, particularly as the targets for new homes are not being met.</p>	<p>See above.</p>
<p>Modal Choice</p> <p>It is clear that the draft SPG is aiming to reduce car usage, and this is accepted in principle. However, this requires an integrated and realistic approach, with carrots as well as sticks.</p> <p>Not providing car parking spaces will not necessarily stop people owning a car, and may well lead to the problems of indiscriminate parking noted in the SPG. Many journeys, particularly by older or less physically able islanders, or by families, either have to be made by car, or for practical reasons, will usually be made by car. The SPG appears to rely almost entirely upon directing islanders onto bicycles,</p>	<p>Planning guidance for the provision of car parking space in association with all forms of development has been in operation in Jersey since September 1988 and is set out in Parking (planning policy note) (gov.je). At this time, the transport strategy adopted by the States of Jersey might be described as one of 'car-accommodation' whereby policy sought to make optimal provision for the car.</p> <p>Since the mid-1990s, however, there has been a significant shift in the strategic policy framework for transport in the island. Successive Sustainable Transport Policies have fundamentally altered the policy emphasis from car-accommodation to seeking to reduce the environmental impact of vehicular traffic and the promotion of other</p>

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<p>but this is not necessarily appropriate for all people, for all seasons, or for all journeys.</p> <p>In our view the SPG fails to give adequate weight to alternative modes of transport other than the bicycle – e.g. car clubs, public transport and motor cycles.</p> <p>Public transport is, for many people, and for many journeys, a more realistic alternative than the bicycle. It is understood that the draft SPG is about parking standards, and therefore it may have been a conscious decision to only set standards for parking and not to include public transport, but in our view this gives an incomplete picture of how a development should provide for travel.</p> <p>Developers will for example usually be required to make substantial financial contributions towards walking, cycling or public transport initiatives and improvements, but the scale of these is unpredictable, adding significant risk for the developer, which can result in a development being aborted altogether. The SPG would be more successful in effecting modal shift and reducing car usage, and much clearer for developers and decision makers to use, if the SPG adopted an holistic approach to travel rather than just covering the provision of physical parking spaces.</p>	<p>more sustainable modes of travel, including walking, cycling and public transport.</p> <p>This presents discord between the policy direction set by the bridging Island Plan, which embodies the objectives of the current Sustainable Transport Policy, and the supplementary planning guidance that is designed to support and complement it.</p> <p>In light of this, there is considered to be an urgent need to review the guidance used to assess planning applications relative to the provision of space for parking, and it is against this background that these revised standards for parking provision in residential development have been prepared.</p> <p>Considerations of the provision of or support for other forms of transport, in association with residential development, are material requirements as a consequence of policies TT1-TT3 of the bridging Island Plan.</p>
<p>we would strongly advocate that the SPG address all residential travel requirements, not just parking, in one document, and therefore be entitled Travel Requirements for Residential Development,</p>	<p>See above.</p>
<p>We strongly advocate that these tables should also include public transport and other financial commitments, and allow flexibility for mobility scooter parking.</p>	<p>See above.</p> <p>The need to make provision for mobility scooters is explicitly referenced in the guidance at section 5.2</p>
<p>If the justification for a higher parking requirement in areas such as Five Oaks and Longueville is that the bus service is not adequate, then we would recommend that rather than set a higher parking standard, (which will encourage car usage), a contribution to improving the bus service, for the benefit of both new and existing residents, should be applied, in the same way that a set contribution is required within the Eastern Cycle Route Area. This would actively assist in encouraging residents, new and old, to use public transport rather than private cars, and also reduce the amount of land required to accommodate car parking spaces. In addition it would assist developers' financial planning and reduce the inconsistency of policy application when a planning application is being assessed.</p>	<p>To enable and encourage people to use the bus instead of their own vehicle additional services across the island to support the choice to switch to public transport are being explored. Five trials have already started and work is ongoing to identify opportunities where better provision of buses can be realised to enhance the service on new or existing routes.</p> <p>This work forms part of the Bus development plan that is being progressed as part of the Sustainable transport policy.</p> <p>The implementation and effect of this work will be kept under review, relative to the definition of sustainable transport zones and the parking standards adopted and applied within them.</p>
<p>Ease of Use</p> <p>Essential to any guidance's success is the need to be easy to use. The draft SPG includes tables within Appendices 3A-3C. Typically users will gravitate to the tables, so all key information should be within these appendices, including comments such as parking requirements will be rounded down, and that zero parking in the Town Centre will need</p>	<p>The guidance needs to be considered as a whole and applicants and decision-makers are required to have regard to all material factors.</p> <p>In developing planning guidance, there is always a judgement to be made about how the guidance is presented in order that it remains clear, easily understood</p>

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to be justified, (currently noted in the text on pages 11 and 13).	and accessible: this is very rarely achieved simply with tables. The potential to promote greater clarity for key aspects of guidance will be considered as part of its revision.
The timetable for next stages needs to be set out as a firm commitment. Two previous SPG's were released as drafts for comment in October 2022 with the period for the public to provide feedback closing in November 2022. Since when there has been no further news. This 'black hole' gives no clarity, and projects / determinations are in-limbo waiting for the position to be confirmed. The public are given 6 weeks to comment, and it is unacceptable that the Government do not then respond to this feedback. The public will disengage if this persists.	Guidance the subject of consultation at the end of 2022 has now been adopted: see New Planning Guidance Issued (gov.je) It is right that the Minister gives due consideration to the issues raised during consultation feedback before issuing revised guidance. This needs to be balanced with competing priorities to develop other new/revised guidance and other Ministerial priorities relative to the resources that are available to undertake this work.
At the end of Section 1 it is confirmed that the new guidance will supersede PPN3 "and all subsequent parking standards <i>approved informally as interim measures</i> by the Minister for Environment." [my emphasis] What are these?	Change The guidance will be amended to clarify the status of this guidance relative to other publications which may make reference to expectations for parking provision, including previously published parking guidelines and also guidance issued in Access onto the Highway - Standards and Guidance (2019).
This guidance should also synchronise with the Building Bye-Laws. The need for having regard for people with disabilities is referenced in 3.1.1 without actually setting out what the relevant requirements are. The dimensions of spaces in the draft SPG are also inconsistent with the current Bye-Laws. There must be consistency across all Regulatory requirements, with consequential amendments to be consulted upon, and delivered, contemporaneously.	The requirements for inclusive access are set out at section 5.2 of the guidance. The revised supplementary planning guidance relates to parking space that is required to be provided for residential forms of development. The specification for car parking space, in Part 8: access to and use of buildings, of the technical guidance for Building Bye-laws relates to buildings other than dwellings.
The draft SPG references (at 3.1.1) the considerations that might be relevant when proposals do not meet the adopted minimum standards, such as the provision of car clubs, improvements to public transport, and the development of new active travel infrastructure. These points move into the scope of other elements of the policy framework, such as Proposal 31 and Policy TT3 of the Island Plan, and the adopted SPG on Planning Obligation Agreements. Are all these matters being progressed / revised in parallel to provide a consistent and up-to-date suite of guidance?	Yes: see related responses above.
In the penultimate paragraph of 3.2.1 it is stated that "in the case of extensions to existing residential buildings, the amount of parking required will be assessed relative to the overall level of potential occupancy of the whole development." This is disproportionate and effectively a retrospective application of controls to matters that would not form part of the application.	This is not accepted. Part of the assessment of any proposals to extend a residential property is to consider whether there is sufficient external space, including parking provision, available to support any increase in potential occupancy of an enlarged dwelling. There is no provision in planning law to remove car parking space from an existing dwelling which already has the benefit of planning permission or is an established

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On the basis of the Standards containing both maximum and minimum requirements, an extension to a dwelling in central St Helier might then also need to include the removal of some car parking, which could then be a disincentive to development which is actually at the top of the spatial strategy hierarchy.	use. If it was proposed to extend a dwelling in St Helier town centre and the property already had one or more car parking spaces, there would simply be no requirement, and a presumption against, the provision of more car parking space in association with the development.
3.2.1 Residential development: 'Subsidised housing' may read better as 'affordable housing' and added to the glossary in Appendix 4. This will align with the Bridging Island Plan.	Noted.
Green spaces and green corridors are also essential to enable people to move across St Helier without having to walk next to busy roads.	Work has been undertaken within the ring road of St Helier to create a mobility plan. The plan will identify schemes which can be delivered to make the ring road more accommodating for cycling and walking and reduce the difficulty in crossing the ring road for those travelling into town by these modes, and for residents and town users who want to cycle or walk around the town on less congested roads.

APPENDIX A

Appendix 1	
<p>On premise charging – Active/Passive supply attached to the property, for personal use by the property it is attached to.</p>	
<p>Off premise charging – Active/Passive supply not directly attached to the property, for personal use by the property it is allocated to. This could be a remote, above ground parking space.</p>	
<p>Multi premise charging – Active/Passive supply not directly attached to the property, for personal use by the property it is allocated to. This could be a remote, underground parking space in a basement by all occupiers of the development.</p>	
<p>Shared car charging - Active/Passive supply not directly attached to any particular property, for shared use by occupiers of the site/development. This could be remote, above ground parking spaces for example.</p>	
<p>Visitor charging – Charging in designated visitor spaces</p>	

APPENDIX B

Combined Impact of both Draft SPG's on the Supply of New Homes and Housing Costs

Examples for Sites Located in the 'Town of St Helier' STZ (Sustainable Transport Zone)

	1-B/1-P Apt Proposed	1-B/1-P Apt Currently	1-B/2-P Apt Proposed	1-B/2-P Apt Currently	2-B/3-P Apt Proposed	2-B/3-P Apt Currently	2-B/4-P Apt Proposed	2-B/4-P Apt Currently	3-B/4-P Apt Proposed	3-B/4-P Apt Currently	3-B/5-P Apt Proposed	3-B/5-P Apt Currently	3-B/6-P Apt Proposed	3-B/6-P Apt Currently	Notes
GIA	40m2	34.5m2	52m2	51m2	62m2	62m2	76m2	76m2	79m2	76m2	88m2	85.5m2	98m2	N/A	
Balcony	5.0m2	1.5	3.0m3	3m2	3m2	3m2	4m2	4m2	4.0m2	4m2	5.0m2	4m2	6.0m2	N/A	Min 1500mm deep
Int Store	2.0m2	2	2.0m2	2m2	2.0m2	2m2	2.0m2	2m2	2.0m2	2m2	3.0m2	2m2	3.0m2	N/A	
Car Parking	0.25 min (5.0m2)	Area 2 = 1 Space	0.25 min (5.0m2)	Area 2 = 1 Space	0.25 min (5.0m2)	Area 2 = 1.5 Spaces	0.25 min (5.0m2)	Area 2 = 2 Spaces	0.25 min (5.0m2)	Area 2 = 2 Spaces	0.25 min (5.0m2)	Area 2 = 2 Spaces	0.25 min (5.0m2)	Area 2 = 2.5 Spaces	1 parking space = 20m2, so 0.25 equates to 5.0m2 area
Visitor Car Parking	0.1 min (2.0m2)	1 Space per 5 dwellings	0.1 min (2.0m2)	1 Space per 5 dwellings	0.1 min (2.0m2)	1 Space per 5 dwellings	0.1 min (2.0m2)	1 Space per 5 dwellings	0.1 min (2.0m2)	1 Space per 5 dwellings	0.1 min (2.0m2)	1 Space per 5 dwellings	0.1 min (2.0m2)	1 Space per 5 dwellings	1 parking space – 20m2, so 0.1 equates to 2.0m2 area
Residential Bicycles	2 min (4.0m2)		2 min (4.0m2)		3 min (6.0m2)		3 min (6.0m2)		4 min (8.0m2)		4 min (8.0m2)		4 min (8.0m2)		2.0m2 area per bicycle
Visitor Bicycles	0.1 min (0.2m2)		0.1 min (0.2m2)		0.1 min (0.2m2)		0.1 min (0.2m2)		0.1 min (0.2m2)		0.1 min (0.2m2)		0.1 min (0.2m2)		For schemes of 10 or more homes Equates to 0.2m2 area per visitor bicycle
Motorcycles	0.1 min (0.2m2)		0.1 min (0.2m2)		0.1 min (0.2m2)		0.1 min (0.2m2)		0.1 min (0.2m2)		0.1 min (0.2m2)		0.1 min (0.2m2)		For schemes of 10 or more homes 2.0m2 area required per motorcycle
Shared External	10m2		15m2		18.5m2		22.0m2		22.0m2		23.0m2		24.0m2		Is land-hungry at ground floor level & shared roof terraces not always practical
Additional Area	14.4m2 (+36% of GIA)		19.4m2 (+37% of GIA)		24.9m2 (+39% of GIA)		28.4m2 (+37% of GIA)		30.4m2 (+38% of GIA)		30.4m2 (+34% of GIA)		30.4m2 (+31% of GIA)		