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1 INTRODUCTION

- 1.1 This Highway Safety Impact Assessment has been developed to demonstrate that the proposed creation of a 2-bed dwelling at 2nd floor level accords with national and local planning policy requirements for highway safety.
- 1.2 This document outlines the existing site (access and number of units), car parking (existing and proposed), access arrangements, waste storage and collection (existing and proposed), cycle parking and servicing.

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2 SITE DESCRIPTION

- 2.1 The former Holly Bush Inn at 200 Lancaster Road is a detached, two-storey public house dating from the early twentieth century. The site is located on the south of the junction of Lancaster and Chase Side. The site is in a designated Local Centre with small provision of shops. The site has a Public Transport Accessibility Level (PTAL) of 3 providing an acceptable level of bus and train links, limiting car journeys.
- 2.2 The site is currently in mixed use, with a Nisa Local convince store (open 7am to 10pm, Mon Sun) at ground floor level and two flats above at the first-floor level.

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3 PROPOSED DEVELOPMENT

- 3.1 Resubmission of planning ref. 19/03428/FUL for the addition of side and rear roof dormers to enable the creation of a 2-bed dwelling in the existing roof of the former Hollybush Public House.
- 3.2 Waste storage will be contained in the side alleyway adjoining the shared front access, this will be accessed via a new wooden gate. The cycle parking will be located in a store within the shared access 'porch' providing cycle parking for 2 x bicycles. No access alterations or additional accesses are proposed.
- 3.3 In regard to car parking, no additional spaces are proposed under this resubmission.

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4 PLANNING POLICY

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 The Development Plan for the London Borough of Enfield comprises:
 - London Plan adopted July 2021
 - Enfield Core Strategy adopted in November 2010 and;
 - Development Management Document (DMD) adopted in November 2014.
- 4.3 The New Enfield Local Plan is being developed to replace the Core Strategy and the Development Management Document covering development in the borough between 2019-2041. The Document is to be put before Enfield Full Council on 19 March 2024 for consideration of Regulation 19 public consultation. Therefore, the emerging local plan has limited weight.
- 4.4 The most recent (revised) version of the National Planning Policy Framework (NPPF) was issued in December 2023 and is a material consideration in the determination of planning applications, particularly where policies contained therein conflict with or supersede parts of the Development Plan.

Local Planning Policy

4.5 The development plan policies relevant to highways impact in assessing this application are:

London Plan (2021)

- D5 Inclusive Design
- D6 Housing quality and standards
- SI 7 Reducing waste and supporting the circular economy
- T3 Transport capacity, connectivity and safeguarding
- T4 Assessing and Mitigating Transport Impacts
- T5 Cycling
- T6 Car parking
- T6.1 Residential parking
- T7 Deliveries, servicing and construction

Enfield Core Strategy (2010)

- CP24 The Road Network
- CP25 Pedestrians and Cyclists

Development Management Document (2014)

• DMD8 General Standards for New Residential Development

- DMD45 Parking Standards and Layout
- DMD47 Access, New Roads and Servicing
- DMD48
- 4.6 These policies are supported by the following supplementary planning guidance in relation to highway safety impacts:
 - The London Cycling Design Standards (2016)
 - North London Waste Plan (July 2022)

National Planning Policy Framework

4.7 Highway safety is covered by Section 9 Promoting sustainable transport which states that transport issues should be considered from the earliest stages of development proposals. Paragraph 114 states :

'In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be or have been taken up, given the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users;
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code⁴⁸; and
- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree'
- 4.8 Paragraph 115 of the NPPF states that development proposals should only be refused on highways grounds if there would be unacceptable impact on highway safety.

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5 HIGHWAY SAFETY IMPACT ASSESSMENT

Access

- 5.1 London Plan policy D5 requires development proposals to be entered, safely used, and exited, easily and with dignity by all persons, this is supported by Enfield policy DMD 47, which addresses all forms of access (pedestrian, cycle and vehicular) within the borough.
- 5.2 On the southwestern part of the site is a dropped curb with parking space for one car, adjacent to the car parking space is a gate for rear access to the retail service yard. Pedestrian access to the existing first floor flats is gained on the northern boundary via an external staircase (east elevation). The proposal will share this access. Adjacent to this is side access to the convenient store and residential waste storage and retail service yard. The site does not have disabled access for the existing flats, nor can this be provided owing to the constraints of the building and site, which does not allow for an adequate extension to accommodate this. On balance it is considered that the proposal is acceptable in this instance.

Public Transport

- 5.3 London Plan policy T3 states that development proposal should utilise existing bus network. London Plan policy T4 requires development proposals to be integrated with the existing and planned transport access, capacity and connectivity. This is supported by Enfield policy DMD 47 c) which states that development proposals should consider access to public transport.
- 5.4 The site is located with a Public Transport Accessibility Level (PTAL) of 3 (acceptable) with Gordon Hill train station 0.6km to the west. Trains run regularly to Moorgate (central London) and Stevenage via Hertford. Chase Side (Stop R) is serviced by bus Nos. 355 (Enfield David Lloyd Centre to Oaklands Nicholas Breakspear School, St. Albans) and W8 (Chase Farm Hospital to Picketts Lock Centre). The adjacent Lavender Hill (Stop Y) is serviced by the No. 191 bus (Edmond Green Bus Station to Brimsdown Station).
- 5.5 It is considered that the above demonstrates that the site accords with London Plan policies T3 and T4 and the relevant policies contained in the local development framework. Therefore, car journeys would be limited from the site, helping preserve highway and pedestrian safety.

Car Parking

- 5.6 London Plan policy T6 states that all residential development proposals should start from the point of car free development in areas with well-connected public transport. London Plan policy 6.1 requires that parking provision accords with table 10.3 of the London plan. Table 10.3 states that maximum residential parking standards in PTAL 3 is up to 0.25 spaces per dwelling. This is supported by Enfield policy DMD 45 which covers parking standard in the borough, requesting developments proposals consider scale and nature proposed, PTAL of site, existing parking pressures and future occupiers' accessibility to amenities.
- 5.7 The site is located in a local centre which has a sufficient provision of retail units including food stores for daily groceries, with the ground floor retail unit being one. This demonstrates that the proposal is in a sustainable location.
- 5.8 The development proposal is minor development with no additional on-site car parking provision proposed. With 1 dwelling proposed and the 0.25 parking space per dwelling rounded,

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the proposal meets the requirements set out in London Plan Table 10.3. The site is not located in or close to the Gordon Hill Controlled Parking Zone (CPZ) with ample parking available in the immediate area, as stated in the council's assessment of the previous application.

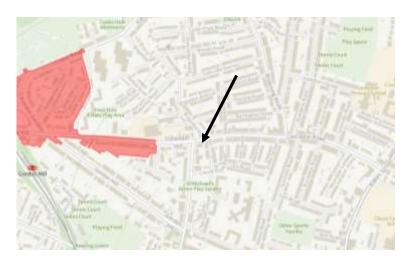


Figure 1: Application site (arrow) outside CPZ (red). Source: Enfield CPZ Mapping

Cycle Parking

- 5.9 London Plan policy 5 requires that cycle parking provision accords with table 10.2 of the London Plan. For this proposal (2-bedroom) 2 cycle parking spaces are required. The London Cycling Design Standards (May 2016) requires cycle parking to be suitably located with locked access. It also states that doorways in internal cycle parking areas be no less than 2 metres in width. This is supported by Enfield policy DMD 45 2 which states development proposals should accommodate cycle parking.
- 5.10 Cycle parking is to be provided in the proposed bike storeroom, accessed by the ground floor communal hall, to ensure 2 x cycle spaces, as required under table 10.2 of the London Plan, whilst enabling access to the plant room (figure 2).

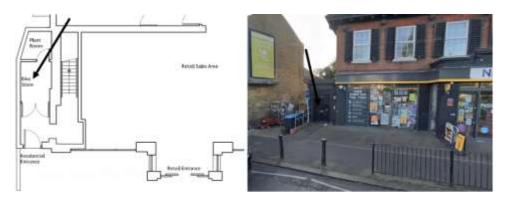


Figure 2: Cycle parking proposed (left) and picture of cycle parking location (right)

5.11 Both the shared access door and cycle storage doors are below the 2-metre minimum door width requirement. However, there is no other available space on the site to create the required sheltered and secured cycle parking as this is taken up via waste storage and retail servicing. To achieve this requirement would need a minor extension to the shared access 'porch' but this is

constrained by the existing and proposed waste storage for the dwellings. Also, the previous application did not raise concerns under the same guidance (see below).

5.12 Therefore, the proposal is considered acceptable in this regard.

Refuse

- 5.13 London Plan policy SI 7 requires development proposals to make best endeavours to complement London's circular economy with sufficient storage, capacity and management of recyclables and waste. London Plan policy D6 E states that development proposals should provide sufficient and unrestricted storage which supports the separate collection of dry recyclables and food waste in addition to residual waste. This is supported by Enfield policies DMD 8 in regard to waste storage and DMD 47 which covers waste collection.
- 5.14 Refuse will be stored in the same location as existing, in the side alley of the building (northeast). As with the previous application a gate is proposed to help screen all existing and proposed waste storage. This shall be within the bin carrying distances for occupiers and waste operators in the relevant refuse supplementary planning guidance. The waste shall be collected as per the existing arrangement with Enfield Waste Services from Lancaster Road.

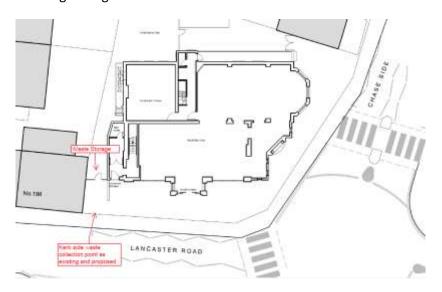


Fig 3. Location of waste storage and collection.

Servicing

- 5.15 London Plan policy T7 states that development proposals should allow for safe, efficient and clean servicing and deliveries. This is supported by Enfield policy DMD 47.
- 5.16 Servicing for the proposed new dwelling will be unchanged from that of the existing other two dwellings on first floor level. This will not interrupt the servicing for the existing ground floor convenience store. The vehicle types would be a Luton Van or a small van in most cases for removals of occupiers' belongings and any deliveries such as retail or online shopping deliveries. This will be unchanged from the existing arrangements for servicing of the two flats at first floor level.

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6 CONCLUSIONS

- 6.1 The proposal is unchanged since its determination in February 2020 and is still considered to be acceptable in regard to highways safety impacts. The site is located in PTAL 3 with good bus routes and a nearby train station. No alteration to existing accesses nor any additional access is proposed. Cycle parking with no additional car parking will enable car free journeys. Should the occupiers and or visitors of the proposal resort to a car journey then the surrounding roads have ample parking.
- 6.2 In regard to waste storage location and collection, there shall be no change from the existing location and arrangements for the two first floor flats. The flat will be serviced no differently to the existing two flats at first floor level without interrupting the servicing of the ground floor convenience store.
- 6.3 Therefore, it is considered that the proposal would not cause harm to highway safety impacts in compliance with the relevant NPPF (2023), London Plan (2021), Enfield Core Strategy (2010) and Enfield Development Management Document (2014) policies.

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