

Appendix 4 – Consultation Issues & Officer Responses

1. Waiting and Loading Restrictions

The 'at any time' waiting restriction was added principally so that double yellow lines could be introduced to make it as clear as possible that vehicles should not enter and /or park in the mandatory cycle lane at any time.

Similarly, the 'at any time' loading restriction was added to make clear that delivery vehicles should not enter the mandatory cycle lane or stop in locations where loading/unloading would be obstructive.

The following tables summarises the various general and specific representations received.

General Representations

Issue	Comment
<p>Difficult/impossible to make deliveries to residential properties</p>	<p>The scheme design standard aims to ensure that inexperienced cyclists feel safe at all times. A mandatory cycle lane with light segregation has been used along the residential sections of the route to provide this level of protection. Loading is not permitted within a mandatory cycle lane and, in most cases, stopping in the carriageway (adjacent to the cycle lane) would be obstructive. To address this problem, loading is permitted on the side road returns (where there are double yellow lines but no loading restrictions). In addition, where there is a significant distance to the nearest side roads, 'loading gaps' have also been provided (eight along Ridge Avenue/Village Road/Park Avenue) where loading is permitted before 7am, between 10am and 3pm, and after 7pm.</p> <p>It is therefore possible to make deliveries to properties along the residential section of the A105. However, a number of respondents highlighted that the 'loading gaps' were not obvious. Whilst the gaps are correctly signed, further steps will be taken to increase their conspicuity.</p>
<p>Legality of limiting parking for blue badge holders</p>	<p>Whilst dedicated bays for blue badge holders have been incorporated into the scheme in a number of places, it is recognised that the opportunity for blue badge holders to park along the residential sections of the A105 are more limited than was previously the case.</p> <p>The exemptions for blue badge holders set out in the Local Authorities Traffic Orders (Exemptions for Disabled Persons) (England and Wales) Regulations 1986 do not apply to a cycle lane during its hours of operation.</p>

	<p>The order introducing the mandatory cycle lane was therefore amended specifically to allow a vehicle displaying a blue badge to enter the cycle lane to set down and pick-up someone with restricted mobility.</p> <p>Blue badge holders can also utilise the 'loading gaps' to park for up to three hours off-peak, when the loading restriction does not apply. Blue badge holders can also park on double yellow lines in the various side roads for up to three hours, where there are no loading restrictions.</p>
Provision for removal van/funerals etc.	Some respondents raised concerns that the cycle lane would prevent vehicles such as removal vehicle vans and hearses from parking directly outside properties when necessary. As applies across the borough, a common-sense approach is taken to enforcement in such situations and PCNs are not issued.
Insufficient loading for businesses	Goods vehicle loading bays were introduced in both Palmers Green and Winchmore Hill town centres as part of the original scheme, with a further three bays introduced experimentally. However, the distribution of bays has changed, and it is recognised that some properties may be less convenient to service than was previously the case. A review of the current balance between parking and loading provision will be commissioned to consider the need for further changes to the current arrangements.
DYLs in side roads unnecessary/too long	The highway code (rule 243) makes it clear that vehicles should not park within 10m of a junction. The extent of double yellow lines generally reflects this requirement.
Parking should be allowed in the evenings/off-peak	The intention is that the cycle lanes are not just used to facilitate commuter cycling, but over time, to cater for a wide range of short trips through-out the day. Parking in the cycle lanes off-peak and in the evening would run counter to this key objective.
Deliveries should be allowed to use the cycle lanes off-peak	Allowing deliveries into the cycle lane off-peak runs counter to the key objective to provide safe facilities for cyclists of all abilities throughout the day.

<p>Double red lines should be used rather than double yellow lines.</p>	<p>Although the current Traffic Signs Regulations and General Directions has introduced some flexibility in the use of red lines, they are still primarily intended to be used on Red Routes, such as the A10 and A406. In any event, the evidence suggests that the existing double yellow lines have been effective in reducing non-compliance.</p>
<p>Lack of loading makes it difficult to attract tenants</p>	<p>Whilst there are some vacant units in both Winchmore Hill and Palmers Green, this is due to a number of factors affecting high streets across the UK, including the increase in online shopping. Reasonable loading provision clearly is a factor in the functioning on high streets and the current arrangements seek to provide a balance between parking and loading requirements, as well as the needs of other road users. However, a further review of the parking and loading arrangements will be commissioned to determine whether additional loading provision needs to be provided.</p>
<p>Encouraged more to pave front gardens</p>	<p>Some additional crossovers were provided along the A105 as part of the scheme, recognising that the mandatory cycle lane would reduce levels of kerbside parking. The displacement of parking into the side roads was considered as part of the previous approval process and the situation has not been made worse by the introduction of double yellow lines, which simply reinforce that vehicles must not park in the cycle lanes or within 10m of a junction.</p>
<p>Not clear if vehicles can wait/load adjacent to cycle lane</p>	<p>The double yellow lines and double kerbside blips clarify the situation by making it explicit that parking and loading is only permitted in marked bays (or 'loading gaps').</p>
<p>Residents should be able to use loading gaps</p>	<p>Unlike designated goods vehicle loading bays, any vehicle loading and unloading can use the 'loading gaps' off-peak for up to 40 minutes.</p>
<p>Deliveries to charity shops are now more difficult</p>	<p>Demand for on-street parking space remains high at times in both Winchmore Hill and Palmers Green and it is accepted that space may not always be available to park outside a particular shop. If all parking places are occupied, vehicles making bulky/heavy donations to a charity shop would also be able to briefly park on double yellow lines in side roads, where there is no loading restriction.</p>
<p>Loading bays should be provided for refuse vehicles.</p>	<p>The standard national exclusions applicable to mandatory cycle lanes have been amended specifically to allow refuse and other maintenance vehicles to enter the cycle lane when necessary.</p>

Blue badge holders should be allowed to park in cycle lane	Blue badge holders can park in the 'loading gaps' during off peak periods for up to three hours. A general relaxation enabling blue badge holders to park along the length of the route would undermine the purpose of the cycle lanes, which is to ensure a continuous segregated facility for people of all ages and abilities.
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Specific Representations

Issue	Comment
Poor signage for 'loading gaps'	The 'loading gaps' are correctly signed in accordance with the requirements of the Traffic Signs Regulations and General Directions 2016, highlighted by the solid (mandatory) cycle lane marking changing to a broken (advisory) line. However, it is accepted that the 'loading gaps' do not stand out and further marking will be introduced to increase their conspicuity.
Lack of loading provision for shops on west side of Winchmore Hill Broadway	<p>The shops and services on the western side of Winchmore Hill Broadway benefit from an adopted rear access road (Broadway Mews), allowing loading and unloading by small goods vehicles. An experimental loading bay was also provided outside 761-765 Green Lane to cater for larger goods vehicles, including drays delivering to the Three Wishes public house. Feedback from one business suggests that this bay is too far from the pub and not used for the intended purpose.</p> <p>Relaxing the loading restrictions is a concern as the carriageway is narrow and delivery vehicles could obstruct northbound traffic, including buses. However, this is less of a problem during off-peak periods and the experimental order has been amended to allow loading and unloading to take place off-peak over a 10m length. The impact of this relaxation will be monitored for a further period before deciding whether to make the change permanent.</p>
Not enough 'loading gaps' – every property should have loading opportunity within 50m	TfL's Kerbside Loading Guidance refers to a 50m maximum distance between a loading facility and a delivery premises, which is a guideline adopted in Paris. Along the residential sections of the route, premises are generally within 50m of either a side road (where loading can take place on the double yellow lines) or a 'loading gap'.

Time able to load/unload in gaps too short.	Within the 'loading gaps' deliveries can take place at all times apart from between 7am and 10am and between 3pm and 7pm. The length of stay is limited to 40 minutes, which has been adopted across the Borough as a reasonable period of time for vehicles of load/unload.
DYLs at Green Lanes/Eaton Park Road inadequate	The double yellow lines at the junction of Green Lanes and Eaton Park Road are a standard 10m in length, in accordance with Rule 243 of the Highway Code.
Use of double blips does not suggest that blue badge holders can access the cycle lanes to set-down/pick-up	There is no authorised way to sign that blue badge holders can enter the mandatory cycle lane to set down and pick-up passengers. This is a local change included in the cycle lane traffic order and civil enforcement officers have been instructed not to issue penalty charges notices to vehicles displaying a blue badge whilst setting down or picking up passengers with restricted mobility.
No provision has been made for the Royal Mail to stop outside Palmers Green post office	Following discussion with the postmaster, a loading bay was specifically introduced outside 352 Green Lanes, approximately 35m from the post office.

Key Actions

- Increase conspicuity of 'loading gaps'
- Review need for loading bay outside On-Broadway.
- Relax loading restriction on western side of Green Lanes in Winchmore Hill Broadway to allow off-peak loading/unloading and monitor impact.
- Review balance between parking and loading provision in Winchmore Hill and Palmers Green

2. Designated bays for blue badge holders

The experimental order provided for designated bays for blue badge holders in the following locations:

- Elm Park Road N21 (south side, east of its junction with Green Lanes N21);
- Compton Road N21 (north side, west of its junction with Green Lanes);
- Green Lanes N13 (between Nos.345 – 347);
- Green Lanes N13 (between Nos.410 – 412);
- Green Lanes N13 (west side, south of its junction with Woodberry Avenue);
- Green Lanes, N21 (between Nos. 891 – 893);
- Hazelwood Lane N13 (south side, east of its junction with Green Lanes);
- London Road EN2 (between Nos.74 – 76), and
- Osborne Road N13 (south side, east of its junction with Green Lanes N13).

No objections were made specifically relating to the nine designated bays. However, the following general and specific representations were made:

General Representations

Issue	Comment
More designated bays needed	The number and location of designated bays along the A105 was informed by previous consultation responses. Very few comments were received suggesting that these designated bays were unnecessary. In fact, several people suggested additional locations where designated bays would be beneficial. These suggestions will be evaluated and additional bays introduced where feasible.
All on-street bays in town centres should be designated for blue badge holders	Where off-street parking is available (e.g. in Fords Grove and Lodge Drive car parks), it was suggested by one respondent that more on-street spaces should be designated for blue badge holders. Whilst the proposal has some merit, a balance needs to be struck between the needs of blue badge holders and other visitors and there is insufficient evidence at this stage that the level of on-street provision is inadequate for blue badge holders.
Too many designated bays	A single respondent suggested that too many designated bays had been provided. Whilst a balance needs to be struck, there is no evidence that the bays provided are not being used and their removal would not be consistent with the need to make reasonable provision for blue badge holders to visit the various shops and services along the route.
<p>The designated bays were too narrow and difficult to use.</p> <p>Designated bays should be in side roads, where there is less risk of conflict.</p>	<p>The on-street designated bays parallel to the kerb would ideally be at least 6600mm long by 2700mm wide. However, the relevant section of the Traffic Signs Manual makes it clear that the width can be reduced where the overall carriageway width is insufficient.</p> <p>A number of respondents commented on the difficulty using the designated bays, particularly where the cycle track is one side and narrower traffic lanes on the other. It is acknowledged that the current situation requires some bay users to be aware of cyclists as well as passing traffic and there is some merit in locating bays in side roads, which are generally quieter. However, this is not possible in every case and the bays at least provide the option for most blue badge holders to park close to the shops and services in the town centre.</p>

Misuse of disabled bays not being enforced	Civil Enforcement Officers regularly patrol the A105 to ensure compliance with the various restrictions, including checking with valid blue badge is displayed.
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Specific Representations

Issue	Comment
A designated bay for blue badge holders should be provided in the vicinity of the chemist/post office in Winchmore Hill Broadway	An additional bay could be created by reducing the extent of the existing pay-and-display bay on the east side of The Broadway. A local consultation will be carried out and, subject to the outcome of this consultation, an additional bay could be introduced on an experimental basis to enable use of the bay to be monitored.
A designated bay for blue badge holders should be provided outside 935 Green Lanes.	One resident suggested that a designated bay should be provided on the eastern side of Green Lanes to assist blue badge holders using the local shops and services in the vicinity of Masons Corner. A 'floating' parking bay has been provided on eastern side of Green Lanes, just north of River Bank. This provides space for 4-5 vehicles to park for up to two hours, with no return within four hours. The time restriction does not apply to blue badge holders. It appears possible to extend the bay northwards to provide space for an additional vehicle and this will be investigated further and implemented if feasible.
A designated bay for blue badge holders should be provided in the vicinity of Bush Hill Parade	There is limited scope to create a bay adjacent to Bush Hill Parade. However, the feasibility of a dedicated bay outside Avenue Parade will be considered. This could also enable access to Bush Hill Parade via the controlled crossing.
Disabled bay in Elm Park Road has faded	The bay will be remarked.

Key Actions

- Make the order permanent to so that all 9 disabled bays are retained
- Review suggested alternative locations and, subject to the outcome of consultation, install additional designated bays on an experimental basis and monitor their use.

3. Free Parking Places

This order introduced additional free parking places in the following locations, where people can park for up to two hours but cannot return within four hours:

- Green Lanes N21, between Nos. 878 – 880 (Saturday only);
- Elm Park Road N21, the north side, east of its junction with Green Lanes N21;
- Shrubbery Gardens N21, the north side, west of its junction with Green Lanes.

None of the representations suggested that the free bays should be removed. However, the following comments were received:

General Representations

Issue	Comment
There was general support for time limited bays, with a general view that 2 hours was a reasonable length of time to visit local shops and services. However, a minority of respondents felt that two hours was either too long or too short a period. A further respondent suggested that bays allowing varying lengths of stay of should be provided.	Each of the bays allows free parking for up to 2 hours, with no return within 4 hours. This restriction is consistent with other bays in the area and strikes a reasonable balance between the needs of the various businesses on this section of Green Lanes. Bays allowing different length of stay in the same area is not recommended as it could be confusing for motorists, resulting in the issue of more PCNs.

Specific Representations

Issue	Comment
Parking in the bay outside 878-880 Green Lanes should be allowed on days other than just Saturday.	A large loading bay was provided outside 878-880 Green Lanes to cater for deliveries by articulated vehicles on Mondays-Fridays. On Saturdays, when deliveries by large vehicles do not take place, there is scope to utilise the bay for additional parking. As with the other time limited bays, parking is unrestricted on Sundays.
The bay in Shrubbery Road restricts access at peak times.	A loading bay has been installed on the northern side of Shrubbery Road, adjacent to the flank of No. 859 Green Lanes. The additional parking bay is sited opposite the loading bay and reduces the carriageway width so that two vehicles cannot pass each other. However, the volume of traffic using Shrubbery Road is relatively low and the current layout does not cause significant delays to traffic on Green Lanes.

The bay in Elm Park Road does not exist	The additional free parking bay in Elm Park Road was installed but the markings have faded and need to be replaced. A new post and sign will also be installed.
The free time limited bays on Green Lanes between Green Dragon Lane and Elm Park Road are not correctly signed.	The bays on this section of Green Lanes have been divided into zones A and B to try and prevent staff working in the area from moving their vehicles from one bay to another, reducing the space available for shoppers. The signage is now correct and the restriction enforceable.

Key Actions

- Make the order permanent
- Remark the bay in Elm Park Road & arrange for post and sign to be installed.

4. Goods Vehicle Loading Bays

This order introduced additional loading bays in the locations below to facilitate loading and unloading by goods vehicles:

- Green Lanes N13, between Nos. 350 – 352;
- Green Lanes N13, between Nos. 761 - 765;
- Lodge Drive N13, the south side, east of its junction with Green Lanes.

The following representations related to these additional loading bays:

General Representations

Issue	Comment
Not enough loading bays	A number of loading bays have been provided along the length of the A105, supported by a permanent traffic order made in July 2018. An additional three bays were added on an experimental basis to supplement this provision. Whilst there are now more dedicated loading bays than pre-Cycle Enfield, it is acknowledged that some businesses have had to adapt their previous servicing arrangements significantly. The Council is developing an overarching action plan for both Palmers Green and Winchmore Hill town centres and the balance between parking and loading will be reviewed as part of this initiative.

<p>Other vehicles should be allowed to use loading bays at certain times</p>	<p>In theory, an order could be drafted to enable a loading bay to be time limited and used by other vehicles at certain times. To an extent this has been done with the bay outside 878-880 Green Lanes which, in agreement with the affected businesses, only applies Monday-Fridays. However, this would be difficult to achieve across the scheme given the wide range of servicing requirements in each of the town centres. In practise, it is also difficult to sign dual use loading/parking bays to ensure that the restrictions are clear to motorists.</p>
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Specific Representations

Issue	Comment
<p>The bay at 350-352 Green Lanes is too small</p>	<p>The loading bay is 8m in length and has been provided specifically for the benefit of Royal Mail vehicles following previous discussions with the postmaster. No objections have been received from the Post Office itself, who advocated the provision of a bay in this location rather than in Park Avenue.</p>
<p>The bay at 761-765 is unnecessary – the space would be better used to widen the footway.</p>	<p>A business adjacent to the loading bay suggested that it was unnecessary, with their deliveries able to take place from Station Road.</p> <p>The bay was introduced experimentally to test the need for an additional loading facility to cater for those businesses on the western side of the Broadway (particularly the two pubs) that require deliveries by large vehicles.</p> <p>In the short-term, it is proposed to retain the loading but undertake further consultation with affected businesses to determine the best use of this space.</p>
<p>The goods vehicle loading bay in Lodge Drive should be dedicated to blue badge holders</p>	<p>Several of the businesses on the corner of Lodge Drive and Green Lanes can be serviced from the rear. However, access for large vehicles is constrained. Loading from the car park access is undesirable due to the narrow width the road and adjacent footway. The provision of a bay outside McDonalds is therefore a useful additional loading /unloading facility for nearby businesses.</p> <p>Blue badge holders cannot use the loading bay as the order specifies it is for use by goods vehicles only. If this were relaxed, it is likely that the bay would become dominated by blue badge holders and cease to function as a loading bay. Bearing in mind that there are eight dedicated bays for blue</p>

	badge holders in Lodge Drive car park, it is proposed that the loading bay be retained.
The good vehicle loading bay in Lodge Drive is not being enforced.	The loading bay is being enforced, but it is acknowledged that there is a level of non-compliance, in particular by food delivery motor cycles associated with McDonalds. Whilst it is particularly difficult to enforce against this type of short-term parking, the Council will continue to use its available powers available to try and ensure that the bay is available for goods vehicles.

Key Actions

- Make the order with respect to the three loading bays.
- Consult local businesses regarding the future use of the loading bay outside Nos. 761 – 765 Green Lanes.
- Review the balance between on-street parking and loading in both Palmers Green and Winchmore Hill town centres.

5. Pay and Display Bays

This order made changes to the pay-and-display parking bay on the northern side of Lodge Drive, mainly to provide additional manoeuvring space for vehicles turning in and out of the car park access road and to help reduce congestion at the junction with Green Lanes

General Representations

Issue	Comment
More parking should be provided along the corridor, some suggesting that there should be an initial period of free parking.	The experimental P&D order relates specifically to the P&D bays in Lodge Drive rather than other P&D bays elsewhere along the A105 and the charge for parking.

Specific Representations

Issue	Comment
The information provided as part of the consultation suggested that the bay was extended eastwards, which is not the case.	The description of the changes to the bay on the statutory notices and in the order and associated plans are correct. The description in the on-line consultation refers to the bay being relocated eastwards. It is acknowledged that this could have been expressed better to make it clear that the bay was shortened by approximately 8m.
P&D bay restricts access to car park	The P&D bay was cut back specifically to minimise congestion on this busy section of Lodge Drive. Computer based vehicle tracking and site observation confirms that the extent of the bay does not interfere with vehicles turning in an out of Lodge Drive car park.

Key Actions

- Make the order to retain the P&D bay in its revised form.

6. Stop and Shop Bay

This order introduced a short-stay, 'stop and shop' bay (with a maximum stay of 15 minutes) on the west side of Winchmore Hill Broadway, replacing one previously on the east side.

General Representations

Issue	Comment
More stop and shop bays should be provided.	<p>There are five 'stop and shop' bays across the borough, one of which was previously on the east side of The Broadway with space for two vehicles. The experimental order replaced this with a bay on the western side of The Broadway, also for two vehicles.</p> <p>Stop and shop bays are intended to provide a free facility for very short stay visits and complement rather than replace other options catering for longer stay kerbside parking.</p> <p>Free parking for up to 45 minutes is also available in both Winchmore Hill and Palmers Green town centres in Fords Grove and Lodge Drive car parks.</p>

Specific Representations

Issue	Comment
The 'Stop & Shop' bay should be signed more clearly.	The bay is signed in accordance with the relevant regulations, making it clear that the length of stay is limited to 15 minutes, with no return allowed with an hour.
The 'Stop & Shop' bay is not convenient for all of the shops in The Broadway.	<p>The current bay by Compton Road is around 150m from the end of the parade of shops that extends up to Station Road, less than 2 minutes walk. The bay by Compton Road can therefore cater for drop-in trips across the town centre.</p> <p>However, it is recognised that there could be benefit in providing an additional 'Stop & Shop' bay to cater for the shops and services on the eastern side of The Broadway. This will be considered further in the context of the town centre action plan, which will include a review of the current on-street parking and loading arrangements.</p>
Longer length of stay should be allowed in the 'Stop & Shop' bay.	<p>There were a range of views regarding the most appropriate length of stay for the 'Stop and Shop bays', with the several suggesting extending the time limit to either 20 or 30 minutes.</p> <p>All of the current 'Stop & Shop' bays in the Borough currently allow parking for up to 15 minutes. However, there is no particular reason not to extend the length of stay to 20 minutes in this instance if this supports local business. It is therefore proposed to modify the experimental traffic order to enable vehicles to park for 20 minutes and monitor the impact of this change for a further period.</p>

Key Actions

- Modify the experimental order to extend the permitted length of stay in the 'Stop & Shop' bay by Compton Road to 20 minutes.