

## Brockley Hill, Harrow

# Rebuttal by David Bird to Proof of Evidence of Nicolina Cooper (LB Harrow) on Transport Matters

226759/N04

## Introduction

1. This is the rebuttal proof of evidence (PoE) of David Bird.
2. In this rebuttal, I address issues raised in the PoE of Nicolina Cooper (NC) who represents the London Borough of Harrow (LBH).
3. Throughout this rebuttal, unless otherwise noted, the paragraph references refer to NC's PoE.

## Rebuttal

4. At the outset I note that NC's evidence is based on the information then available to her about the layout and operation of the car park. As I have explained in my proof, both the layout of the car park area and how it will be managed have evolved recently and therefore the information on which NC has based a number of her points is now superseded.
5. Para 5.9: As set out at paras 4.11 and 4.12 of my proof the proposed parking numbers are now:

**Table 1: Revised Car Parking Numbers**

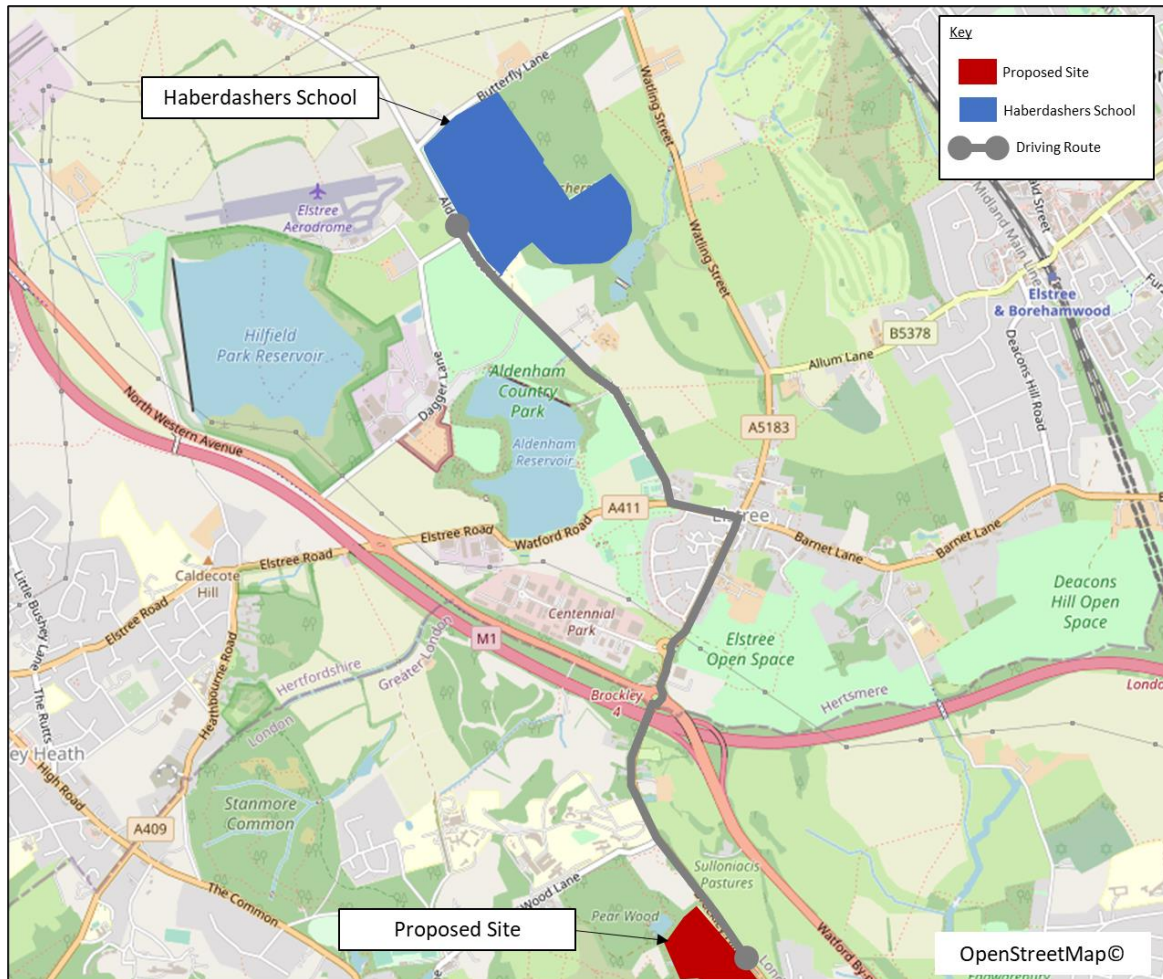
Layout	Guest Spaces					Staff Spaces	Total
	Standard	Enlarged	Disabled	Valet	Total		
Standard	93	4	7	0	104	5	109
Valet	93	4	7	20	124	5	129

6. A minor error has been identified on the Valet Parking Layout drawing submitted as Appendix B of my PoE (Drawing No 226759/PD02 Rev C). A valet car parking space (Space No V20 adjacent to the staff parking) had been omitted from the plan. This has been corrected on Revision D of the drawing included at **Appendix A** of this rebuttal. There are no consequential changes to any of the car parking numbers quoted in my main proof or this rebuttal.

7. Paras 5.17 and 5.18: I note what NC says in relation to the number of available surveys. However, additional surveys were undertaken at Premier Banqueting events in March/April 2022 which support the original surveys and which I refer to at para 5.16 of my proof. I am therefore confident that the surveys of the former Premier Banqueting facility provide a sound basis for estimating the trip generation of the same facility but at the proposed new location.
8. In any case, in my analysis I have used very conservative assumptions on parking demand when compared with the surveys. As I have set out at para 5.20 of my proof, the survey from the 500-person event indicated a demand for 39 car parking spaces. There will actually be 124 guest spaces available (including valet spaces). This is over 3 times the number that would be required based on the survey data.
9. NC confirms that there is no other data available to the inquiry.
10. Para 5.19: The table at para 5.19 refers to a number of sites which NC considers comparable to the appeal proposal. In the final column a parking ratio is given and NC states that all the venues have more parking available than the appeal proposal in absolute terms and as a proportion of guest capacity.
11. I consider the ratio of parking spaces to guests to be the correct comparative measure. If the revised maximum spaces to be provided at the appeal site is taken (124 guest spaces) this leads to a ratio of one parking space for every 4 guests for a 500-person event. This is better than the Kadwar Patidar Centre (one parking space per 5.1 guests for on-site provision) and comparable with Byron Hall and the Dhamecha Lohana Centre.
12. I also note that the Kadwar Patidar Centre uses overspill parking in a nearby school, which is exactly what is envisaged for the appeal scheme.
13. Sections 6 and 7: In these two sections of her proof, NC reports on an analysis of residential streets in the area and the available parking spaces. She then goes on to report on parking surveys that the Council commissioned.
14. Whilst I note the content of these sections, I do not consider them pertinent to the Inspector's assessment of the transport issue. It is not part of my client's proposal to rely on any parking in residential streets. My evidence demonstrates that, with the spaces available on site and the benefit of the Car Park and Event Management Plans, there is no realistic prospect of parking taking place in the residential streets in the area.
15. Para 8.1: I stress that I do not consider there to be a realistic prospect that on-street parking will take place. I have demonstrated at paras 5.25 to 5.30 of my proof that, for a 500-guest event, it is highly likely that all parking will be accommodated on site, even if assumptions that are considerably more conservative than derived from the surveys are used. Even if all parking could not be accommodated on site, overspill parking will be made available in the area.

16. In relation to overspill parking, I attach at **Appendix B** correspondence with Haberdasher’s School that demonstrates their willingness to provide overspill parking. Haberdasher’s School has both dedicated car parking and a separate coach parking area which could be utilised by the applicant. The location of the school is shown below and is circa 4km drive from Brockley Hill.

**Figure 1: Location of Haberdasher’s School**

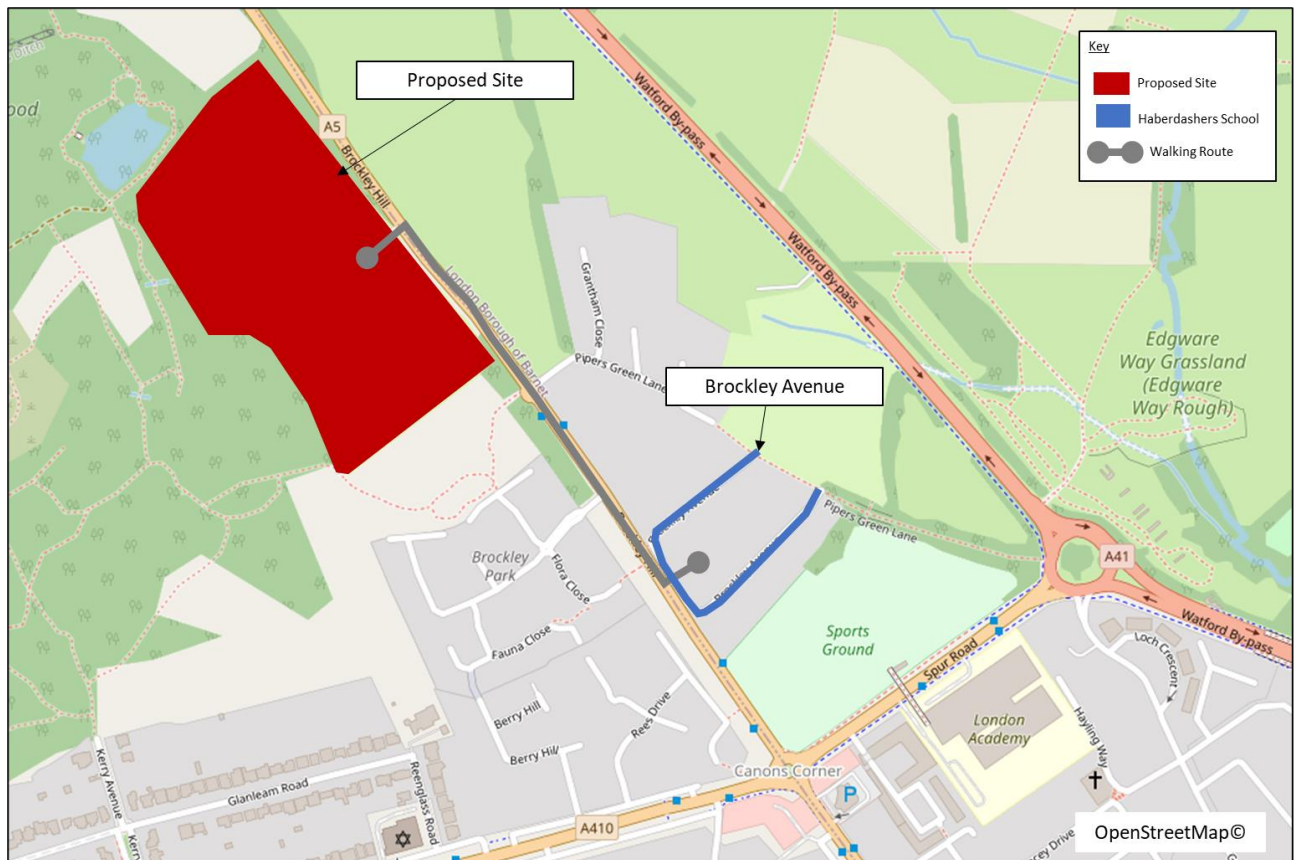


17. Para 8.2: Whilst I consider it highly unlikely that any event-related parking would take place on Brockley Hill, as I have set out at paragraph 6.16 of my proof, the Appellant is prepared, in principle, to contribute to the introduction of parking controls on Brockley Hill.
18. In Section 9 of her proof, NC considers the proposals for management of events and raises various concerns. Since NC considered these proposals, the management plans have been developed in greater detail, as explained below.
19. Para 9.1 and 9.2: The Car Park Design and Management Plan will be secured by condition and needs to be agreed by the Council at least 6 months prior to the first event. The proposed condition lists the measures that will be included in the plan. One of the key measures is that a professional

car park management company will be on site for all events, not just those attended by 350 guests or more.

20. For events with 350 or more guests, an Event Management Plan will also be implemented and this is secured in the s. 106 obligation. The purpose of the Event Management Plan is to provide information on the available overspill parking.
21. Para 9.3: Information on the number of guests attending an event will be provided by the applicant to the Council.
22. Para 9.4: NC suggests that “double” parking (what I have referred to as “valet” parking) and off-site parking (what I have referred to as “overspill” parking) are not feasible as these rely wholly on the co-operation of guests.
23. I do not see this as an issue. Valet parking, i.e., where one’s car is parked by a driver, is common at a number of locations such as airports, hotels and other major venues and events. The parking will be undertaken by professional drivers who are trained and insured. Guests would have been advised of the use of such parking in their information pack before arrival at the venue.
24. The alternative, suggested by NC, is that guests will park on the street outside the site. This would not be on Brockley Hill since it is proposed to introduce parking controls on that road. The location where NC considers such parking is, in theory, most available is on Brockley Avenue (see the tables at para 7.4 of NC proof). However, the northern arm of this road is a distance of circa 650m from the venue as shown below.

**Figure 2: Walking Route and Distance from Brockley Avenue to Site**

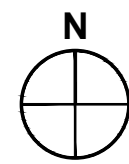
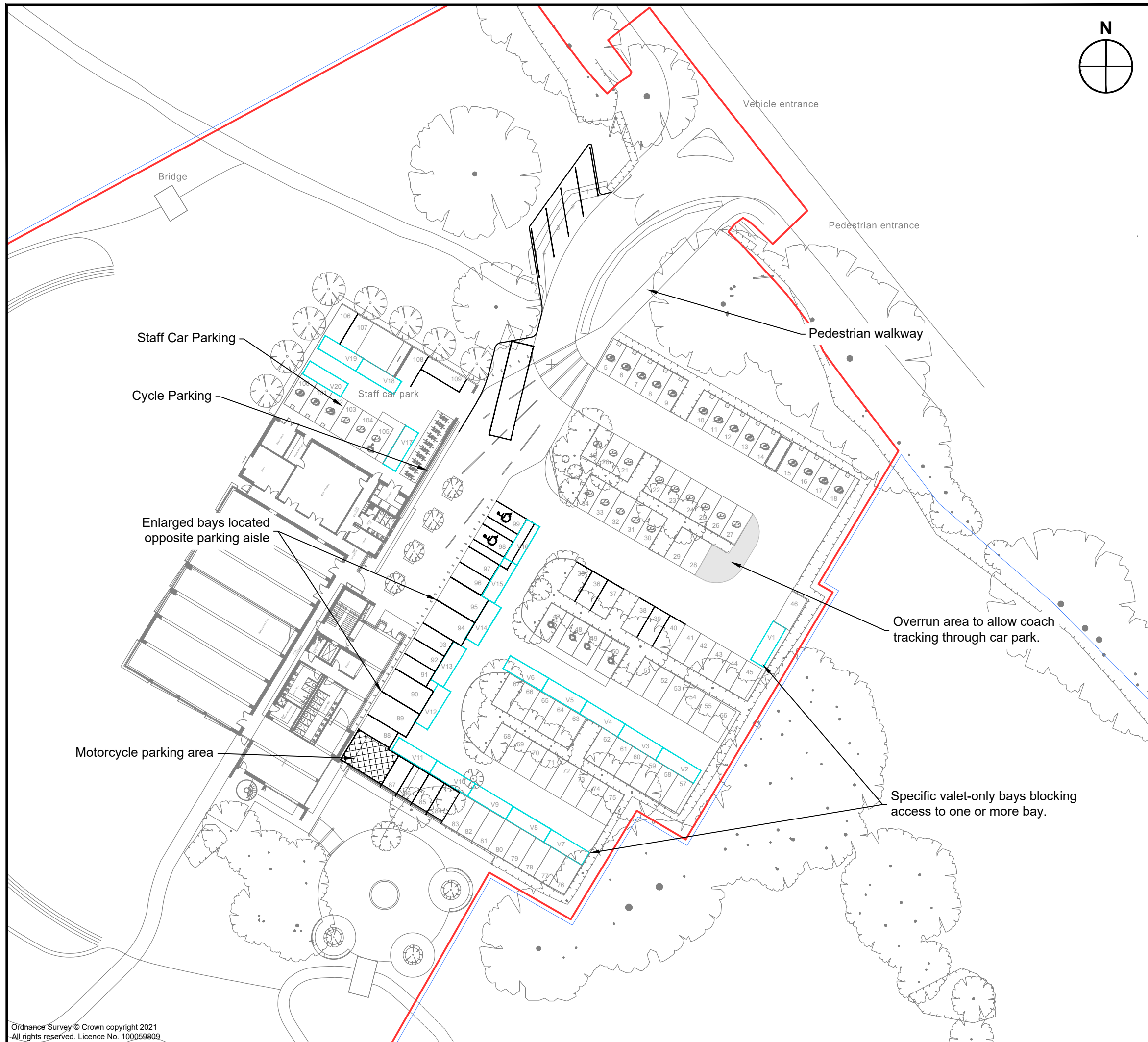


25. It is difficult to see what the incentive would be for a guest to park on the street and have a circa 8–10-minute walk adjacent to traffic (in smart wedding clothes and potentially in inclement weather), compared with handing over the keys to an insured, professional driver at the entrance to the event building.
26. Para 9.5: Use of the Elstree Manor Hotel for overspill parking no longer forms part of the proposals.

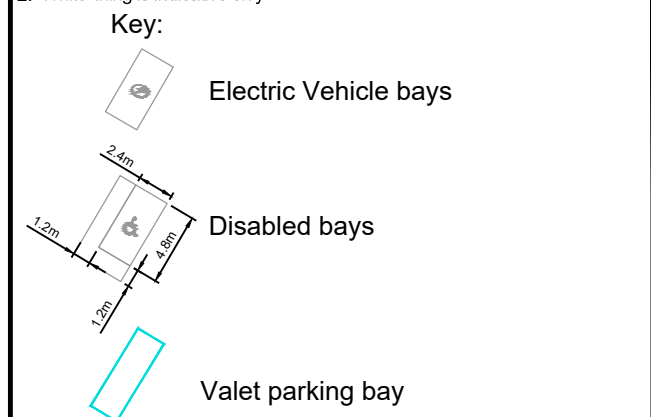
## Conclusions

27. In conclusion, I remain of the view that the detailed car park layout proposals and management plans proposed by the Appellant would enable all events held at the proposed venue to be robustly managed. I do not consider that the matters raised by NC in her evidence demonstrate to the contrary. I consider it extremely unlikely that there would be any demand for parking on residential streets in the area.

## **APPENDIX A**



**Notes:**  
 1. This is not a construction drawing and is intended for illustrative purposes only  
 2. White lining is indicative only.



**Bay count**  
 Standard : 93  
 Enlarged: 4  
 Disabled: 7  
 Staff: 5  
 Valet: 20  
 Total = 129

D	Minor updates to valet layout.	TF	DB	26.09.2022
C	Updates to layout.	TF	DB	09.09.2022
B	Updates to layout.	TF	DB	31.08.2022
A	Updates to layout.	TF	DB	23.08.2022

REV.	DETAILS	DRAWN	CHECKED	DATE

STATUS:  
**FINAL**

CLIENT:  
**Sairam (Holdings) Ltd**

PROJECT:  
**Stanmore and Edgware Golf Centre, Brockley Hill, Stanmore**

DRAWING TITLE:  
**Car Park Valet Layout**

SCALES:  
**1:500 at A3**

DRAWN:	TF	CHECKED:	DB	DATE:	18.08.2022
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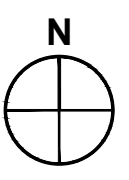
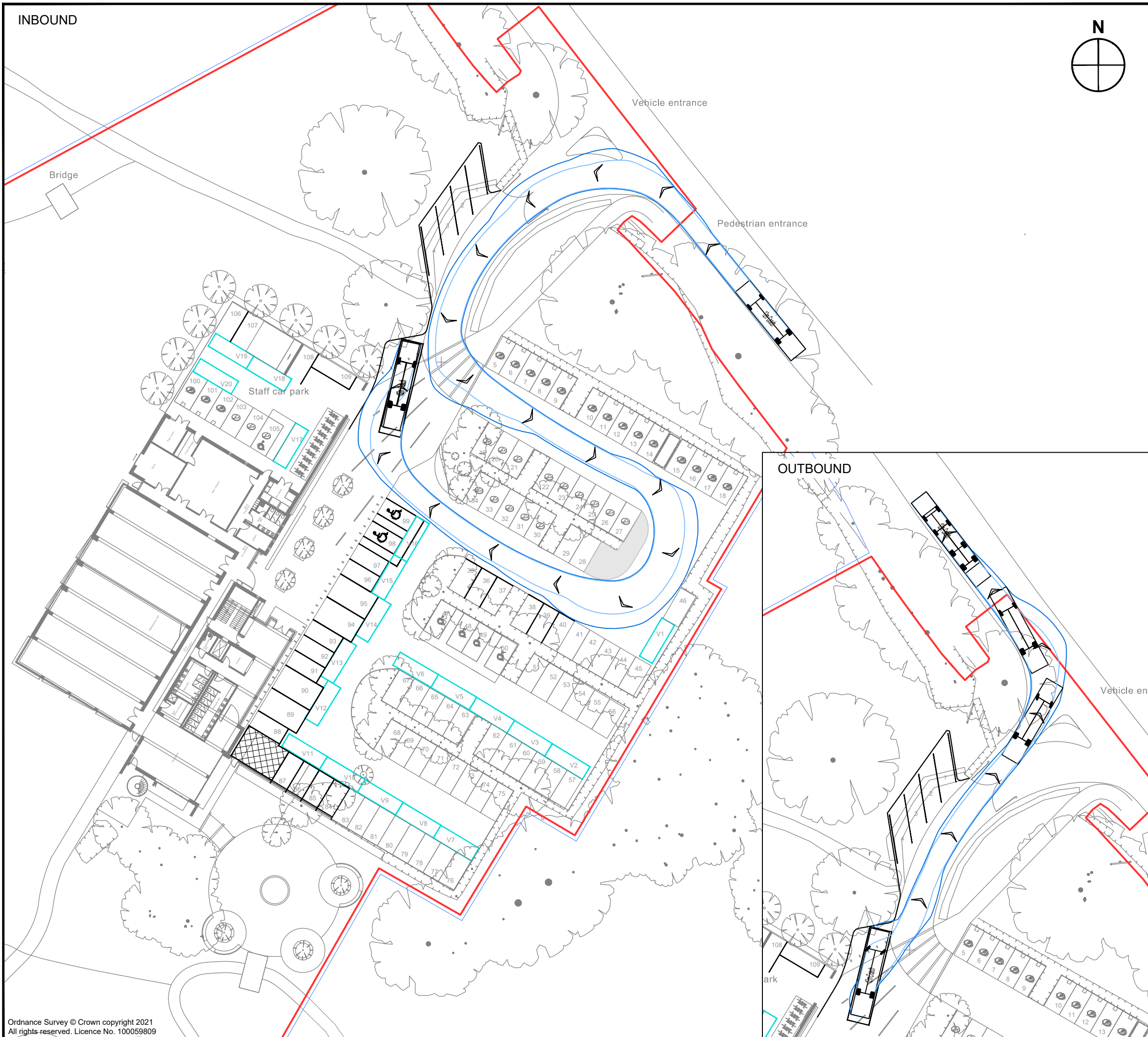
**vectos.** | PART OF **SLR**

The Cursitor, 38 Chancery Lane, London, WC2A 1EN  
 020 7580 7373 vectos@vectos.co.uk

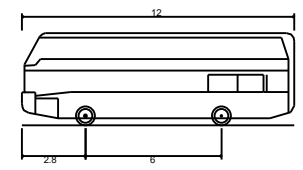
DRAWING NUMBER: **226759/PD02** REVISION: **D**

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Notes:  
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 2. White lining is indicative only.



12m Coach  
 Overall Length 12.000m  
 Overall Width 2.550m  
 Overall Body Height 4.069m  
 Min Body Ground Clearance 0.308m  
 Track Width 2.350m  
 Lock to lock time 4.00s  
 Wall to Wall Turning Radius 10.771m

REV.	DETAILS	DRAWN	CHECKED	DATE
B	Minor updates to valet layout	TF	DB	26.09.2022
A	12m coach added	JB	DB	09.09.2022

STATUS: **FINAL**

CLIENT: **Sairam (Holdings) Ltd**

PROJECT: **Stanmore and Edgware Golf Centre, Brockley Hill, Stanmore**

DRAWING TITLE: **Swept Path Analysis  
Car Park - Valet Layout  
12m Coach**

SCALES: **1:500 at A3**

DRAWN: TF    CHECKED: DB    DATE: 31.08.2022

**vectos.** | PART OF **SLR**

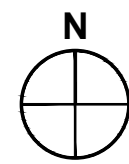
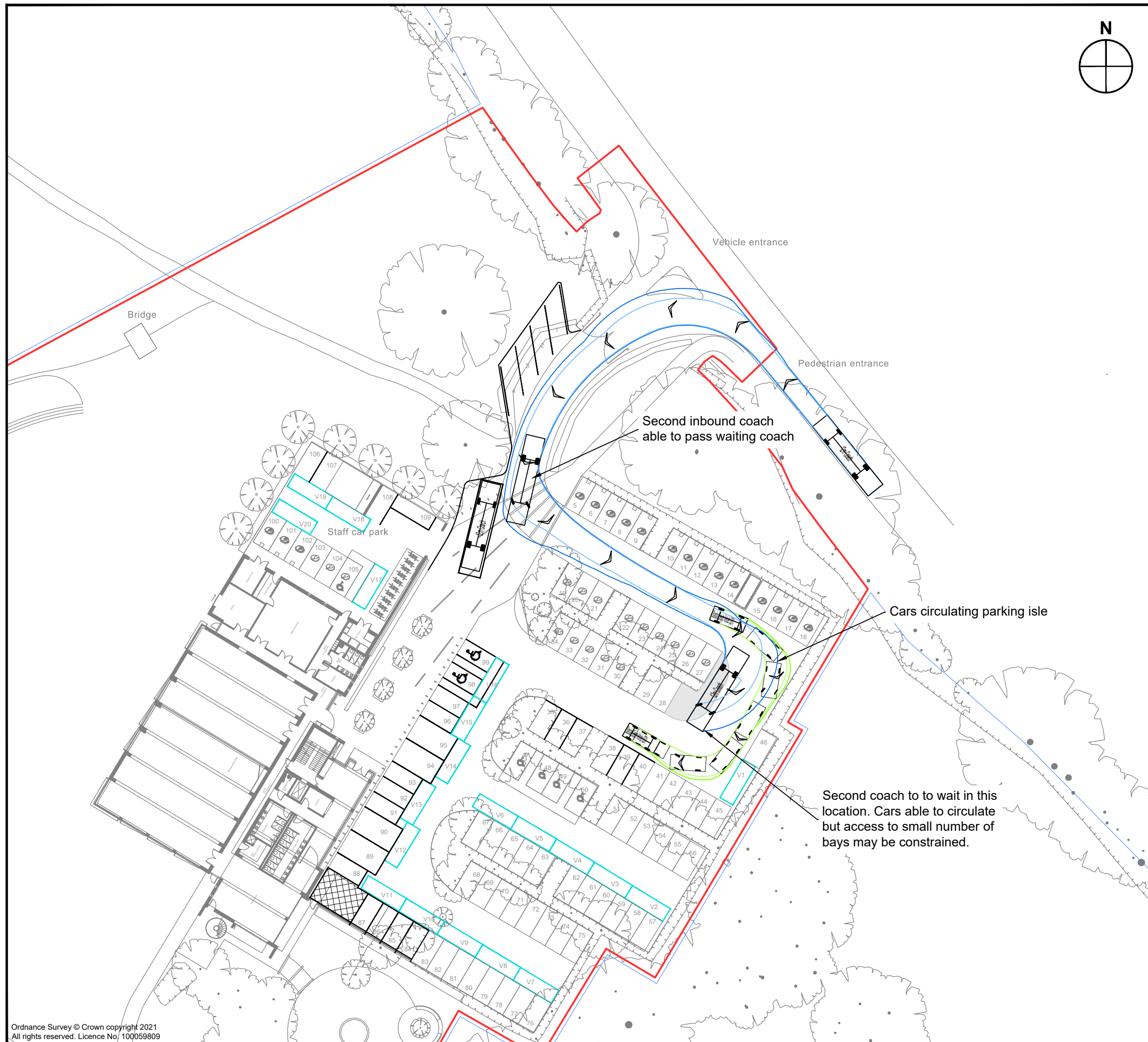
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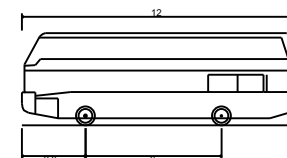
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12m Coach  
 Overall Length 12.000m  
 Overall Width 2.550m  
 Overall Body Height 4.069m  
 Min Body Ground Clearance 0.308m  
 Track Width 2.350m  
 Lock to lock time 4.00s  
 Wall to Wall Turning Radius 10.771m

REV.	DETAILS	DRAWN	CHECKED	DATE
B	Minor updates to valet layout	TF	DB	26.09.2022
A	Updates to layout	TF	DB	09.09.2022

STATUS:  
**FINAL**

CLIENT:  
**Sairam (Holdings) Ltd**

PROJECT:  
**Stanmore and Edgware Golf Centre, Brockley Hill, Stanmore**

DRAWING TITLE:  
**Swept Path Analysis  
 Car Park - Valet Layout  
 2 x 12m Coach**

SCALES:  
**1:500 at A3**

DRAWN: TF    CHECKED: DB    DATE: 31.08.2022

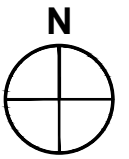
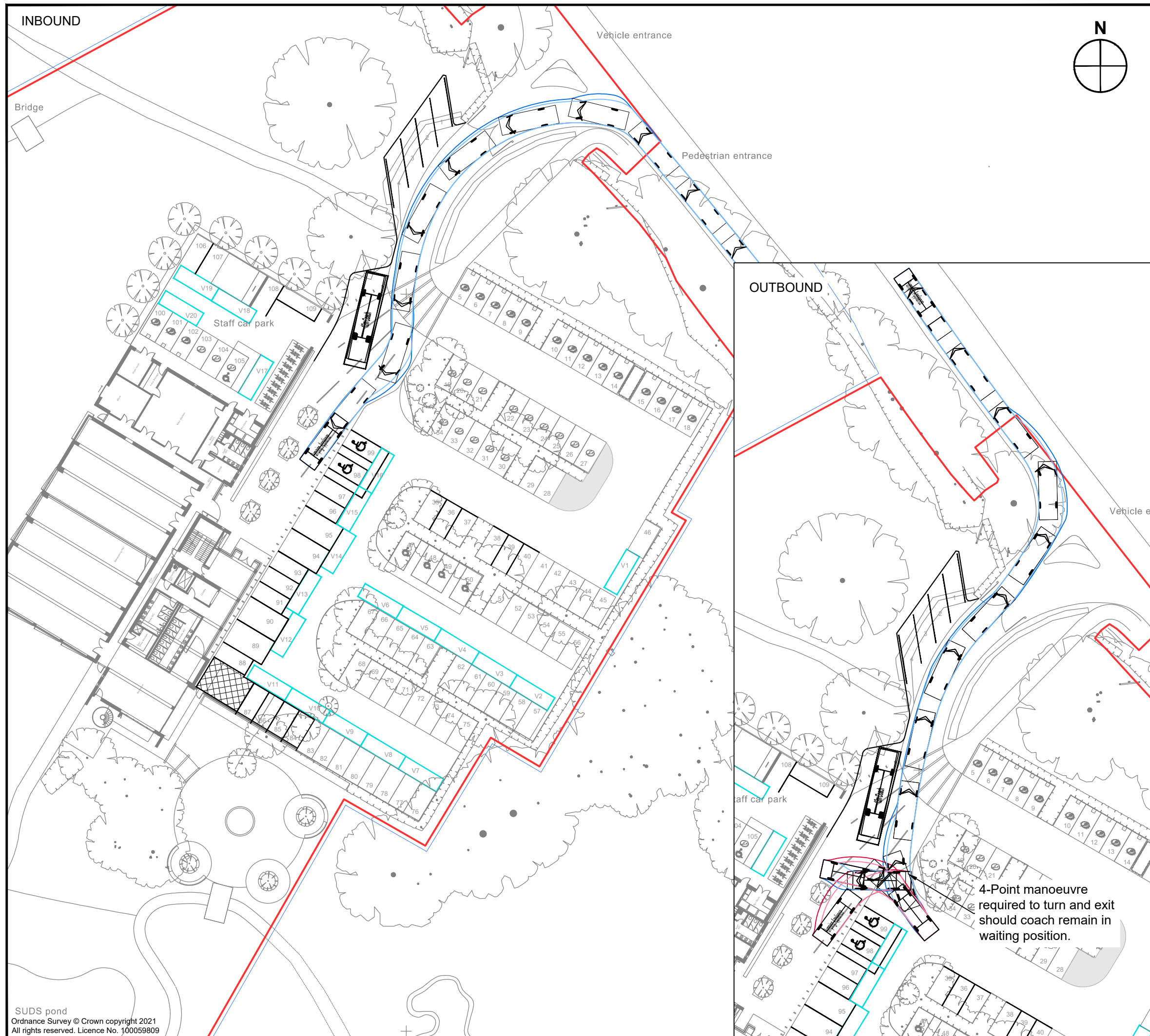
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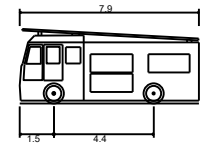
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Pumping Appliance  
 Overall Length 7.900m  
 Overall Width 1.500m  
 Overall Body Height 3.300m  
 Min Body Ground Clearance 0.140m  
 Track Width 2.500m  
 Lock to lock time 4.00s  
 Kerb to Kerb Turning Radius 7.750m

REV.	DETAILS	DRAWN	CHECKED	DATE
A	Minor updates to valet layout	TF	DB	26.09.2022

STATUS:  
**FINAL**

CLIENT:  
**Sairam (Holdings) Ltd**

PROJECT:  
**Stanmore and Edgware Golf Centre, Brockley Hill, Stanmore**

DRAWING TITLE:  
**Swept Path Analysis  
 Emergency Fire Vehicle  
 Access**

SCALES:  
**1:500 at A3**

DRAWN: **JB**    CHECKED: **DB**    DATE: **09.09.2022**

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DRAWING NUMBER: **226759/AT/A04**    REVISION: **A**

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## **APPENDIX B**

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**From:** Richard Henley <rhenley@hghconsulting.com>  
**Sent:** 16 September 2022 12:51  
**To:** David Bird; Hannah Alsop; Gwion Lewis; Heather Sargent; Ravi Ruparelia; John Bowman; Rosa Simson  
**Subject:** Fwd: Habs School Car & Coach Parking - Enquiry

Gwion / David *et al*

Please see below an affirmative response from Habs School re: overspill car and coach parking.

kind regards

Richard

**Richard Henley**  
Executive Director



Planning, Environment &  
Development

45 Welbeck Street, London W1G 8DZ  
020 3409 7755 | 07812 522 423

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----- Forwarded message -----

**From:** Rob Dunn <[Dunn\\_R@habsboys.org.uk](mailto:Dunn_R@habsboys.org.uk)>  
**Date:** Fri, 16 Sept 2022 at 11:15  
**Subject:** Re: Habs School Car & Coach Parking - Enquiry  
**To:** Richard Henley <[rhenley@hghconsulting.com](mailto:rhenley@hghconsulting.com)>

Dear Richard,

Further to your email dated 9 September 2022 and our recent meeting, I would like to confirm that we have the car park capacity at the schools to be able to accommodate the requirements set out in your email below. In principle, we would therefore be willing to commercially explore your client's future access and usage requirements.

Thank you for reaching out and look forward to following up with you or your client in the fullness of time.

Regards,

Rob Dunn

COO

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On Fri, 9 Sept 2022 at 08:13, Richard Henley <[rhenley@hghconsulting.com](mailto:rhenley@hghconsulting.com)> wrote:

Helen / Rob

Good morning

I am now in a position to provide you some further details regarding the proposed use of Habs School coach and car parking facilities.

I am the lead planning advisor to Premier Banqueting (PB), a specialist ethnic wedding banqueting operator for over 15 years based in the Harrow area. Earlier this year Premier Banqueting's central Harrow venue was closed due to Harrow Council's proposed civic centre redevelopment of the car park opposite the venue, which provided the parking for the banqueting hall.

Over the last couple of years PB having been searching for a new site for a replacement wedding venue, specifically catering for the South Asian and ethnic communities, and have acquired the former Stanmore & Edgware Golf Centre on Brockley Hill (approx 2 miles from Habs).

The proposed banqueting facility will have a maximum capacity of 500 guests. The former Golf Centre has space for c.130 vehicles, and whilst it is expected that car parking would be

accommodated on site for the vast majority of events (av. 350 persons) on some occasions additional off-site parking may be required for the larger attendance events. Of note, Asian weddings quite often use coaches to bring guests to the venue who may be travelling from outside of London.

Premier Banqueting is looking to identify a location where any additional cars and/or coaches could be parked in a safe and secure location in close proximity to the main Brockley Hill venue.

Due to the nature of the events to be taking place at the venue, PB will be able to give significant prior notice when the car / coach parking would be needed so that any calendar event clashes with the School can be avoided. Some of the events are held on weekday evenings, but the majority will be weekends, principally outside of the School day.

A booking system will be in place for guests attending the event/site for their parking spaces, with on-site security and car park management stewards, employed by Premier Banqueting, who could also be based at the School if Habs security staff are not available.

We envisage a requirement for around 50 cars and upto 4 coaches.

Premier Banqueting, will pay a fair and reasonable commercial rate for the spaces, which can be discussed / agreed in due course.

If this proposition is of interest, I would be grateful if you could write back to me confirming this, following which I will put you in touch with the owner of Premier Banqueting to meet and set out the terms in more detail. If you need any further information or clarification please get in touch.

Thank you and I look forward to hearing back from you on this opportunity.

kind regards

**Richard Henley**  
Executive Director



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