

PROOF OF EVIDENCE

# Sairam (Holdings) Ltd

Stanmore and Edgware Golf Centre

Brockley Hill

September 2022

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Proof Of Evidence of David Bird BSc, CEng, MICE  
On Transport Issues

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## Report control

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## 1 Introduction

- 1.1 This is the Proof of Evidence of David Robert Bird. I am a Chartered Engineer and a member of the Institution of Civil Engineers. I am a founding Director of Vectos, a firm of transport consultants specialising in the assessment of all forms of development. I was previously a Director of Savell, Bird and Axon for 17 years. I have over 30 years' experience specialising in the transport effects of development on behalf of both private sector clients and local authorities. I undertake work for a range of major companies in the transport, housing, retail and commercial sectors, and have extensive experience of presenting evidence at public inquiries.
- 1.2 I have particular expertise and experience of dealing with development sites and currently act for a broad range of clients including Berkeley Group, Stanhope, Prologis, Land Securities, Places for People, Persimmon, Columbia Threadneedle, Taylor Wimpey and British Land as well as local planning authorities. I assisted with the drafting of the transport section of the NPPF.
- 1.3 I have been an expert witness at numerous public inquiries, DCO hearings and Local Plan examinations in public. I was transport expert witness at the DCO hearings for Hinkley Nuclear Power Station and Daventry International Freight Terminal. Most recently I have given evidence on residential schemes in Turnden (Kent) and Great Dunmow (Essex). I acted for Berkeley Group on the residential led, mixed use scheme at Southall Gasworks which included an Asian wedding venue.
- 1.4 I am appointed by Sairam (Holdings) Ltd (referred to as the applicant from here on) to provide transport and highways advice in relation to this site.
- 1.5 The original transport planning work was undertaken by EAS Transport Planning (EAS).
- 1.6 I have fully reviewed the work undertaken by EAS and concur with it. However, I have sought to build on EAS's work and enhance some elements of the Travel Plan (Core Document (CD) 85) and Car Park Management Plan (CD 76) which I explain later in this proof. The key elements of those plans are included in the S106 Obligation. I have also sought to further enhance the site layout to maximise efficiency.

### Engagement with Stakeholders

- 1.7 EAS proactively engaged with the Greater London Authority (GLA), London Borough of Harrow (LBH), London Borough of Barnet (LBB) and Transport for London (TfL) pre and post the submission of the planning application. I have sought to continue that engagement.

### Agreements and Outstanding Issues

- 1.8 In the paragraphs below I give a brief summary of the areas where agreement has been reached with the authorities and what the key outstanding issues area.

#### Areas of Agreements

- 1.9 Vehicular access to the site is from Brockley Hill. The proposed alterations to the access layout are agreed. These would prevent right turning into the site to allow for coaches and refuse vehicles to safely enter and exit at the site, as well as preventing queuing on Brockley Hill. It is agreed that the

outstanding issues from the Stage 1 Safety Audit (included at CD 68) can be dealt with at detailed design stage.

- 1.10 It is agreed that the speed limit on Brockley Hill should be reduced to 30mph using the appropriate procedures.
- 1.11 It is agreed that the wider highway network would have sufficient capacity to accommodate the number of vehicles proposed “*without severe detriment*” (para 6.5.14 of the June 2021 officer’s report).
- 1.12 It is agreed there will not be any unacceptable safety impacts on the surrounding highway network with the exception that the Council has some safety concerns related to parking on nearby streets.
- 1.13 It is agreed that the travel surveys undertaken at the previous Premier Banqueting venue provide the best available information for estimating trips to the proposed venue.
- 1.14 It is agreed that coaches can be parked off site and therefore only need to be on site to drop-off and pick-up guests.
- 1.15 It is agreed that the provision of long and short stay cycle parking spaces is in accordance with the London Plan and is acceptable to the Council (para 6.5.25 in the June 2021 officer’s report).
- 1.16 The proposed delivery and servicing operations (para 5.5.26 of the June 2021 officer’s report) and the Outline Construction Logistics Plan (para 6.6.27 of the June 2021 officer’s report) are agreed.
- 1.17 It is agreed that the development complies with London Plan policies T2 and T5 and the Local Plan policy DM44. (Statement of Common Ground (SoCG) para 7.42)

#### Areas of Disagreement

- 1.18 The areas of disagreement are helpfully summarised in the Council’s comments in the Draft Statement of Common Ground (SoCG). They state the following.

*“The Council considers that the car parking demand generated by the proposed development in relation to large scale events will result in congestion overspill into the surrounding residential streets causing harm to highway and pedestrian safety and detrimental impacts to the residential amenities of the surrounding neighbouring occupiers. However, the Council accept the impacts for smaller and daytime events, will be less likely to cause overspill parking.”*

- 1.19 The above should be read in conjunction with Reason for Refusal 3 which refers to on site car parking provision and integrated drop-off/pick-up facilities.
- 1.20 Hence, in summary I consider the position to be as follows:
  - i) The proposed site access layout is satisfactory;
  - ii) The proposal would not have an unacceptable impact in terms of capacity or safety on the surrounding highway network;

- iii) The on-site facilities are satisfactory for smaller events;
- iv) However, for larger events, the Council consider that not all parking will be able to be accommodated on site and that an overspill facility will be needed. To date, in the Council's view, insufficient details have been provided to demonstrate that a satisfactory overspill facility is available;
- v) The concern is therefore that parking may take place on surrounding streets with a negative impact on safety and residential amenity.

**Scope of Evidence**

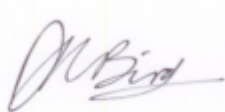
1.21 In this Proof of Evidence, I will:

- i) Describe the location of the appeal site from a transport perspective;
- ii) Provide a summary of the relevant transport policies;
- iii) Explain the transport measures that form part of the proposals;
- iv) Set out the travel characteristics for the site in relation to the anticipated trip generation;
- v) Explain the site operation in further detail;
- vi) Address the relevant reason for refusal;
- vii) Address third party comments; and,
- viii) Summarise and conclude my evidence.

**Declaration**

1.22 The evidence which I have prepared and provided for this appeal (in this Proof of Evidence) is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinion.

David Robert Bird



.....

## 2 Existing Conditions

2.1 In this section I give a brief summary of the site location from a transport perspective.

### Site Location

2.2 The proposed site is situated circa 2.3km in a north-easterly direction from the district centre of Stanmore and on the eastern perimeter of Stanmore Country Park. The strategic and local site location is shown in **Figures 2.1 and 2.2**.

**Figure 2.1: Strategic Site Location**

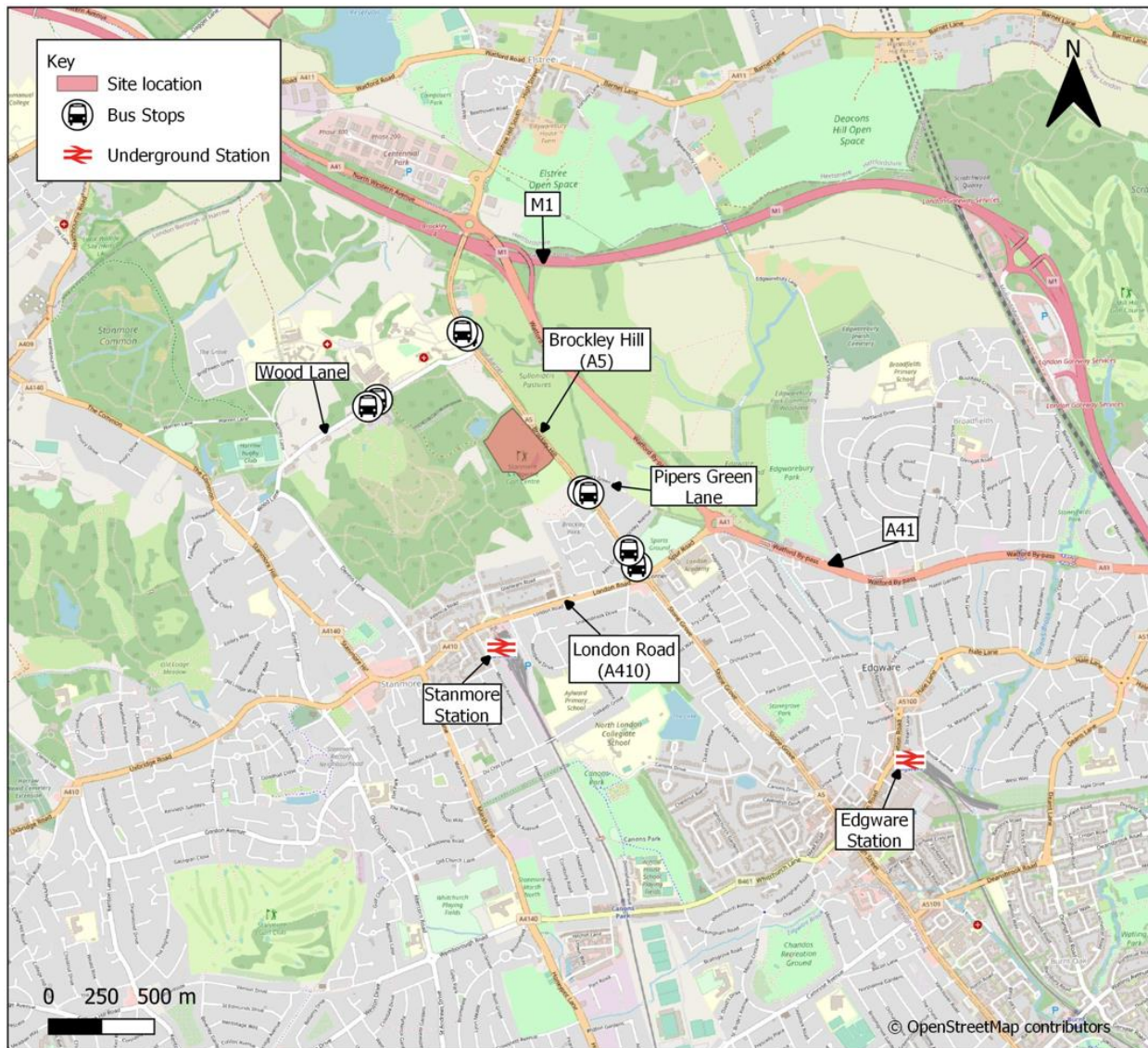
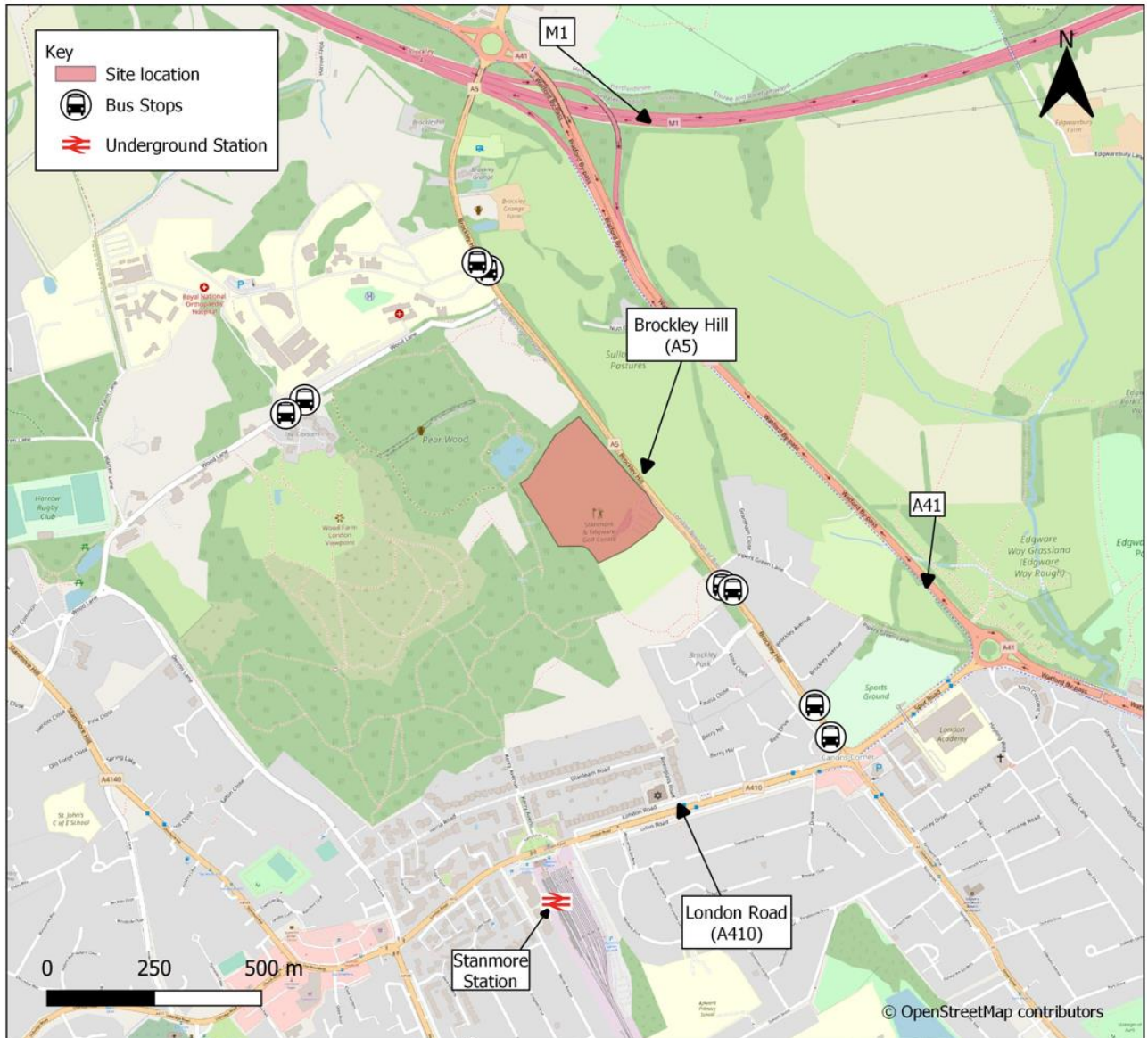


Figure 2.2: Local Site Location



- 2.3 The existing site comprises a permanently closed 9-hole par 3 Golf Centre parallel to the A5 (Brockley Hill), which closed with immediate effect in autumn 2019. The site has an existing on-site parking area for circa 95 cars.
- 2.4 Brockley Hill, which is a single carriageway road subject to a 40MPH speed limit, links to London Road at the Canons Corner roundabout which provides a direct link into the centre of Stanmore. To the north Brockley Hill connects to the A41.

**Non-Vehicular Accessibility**

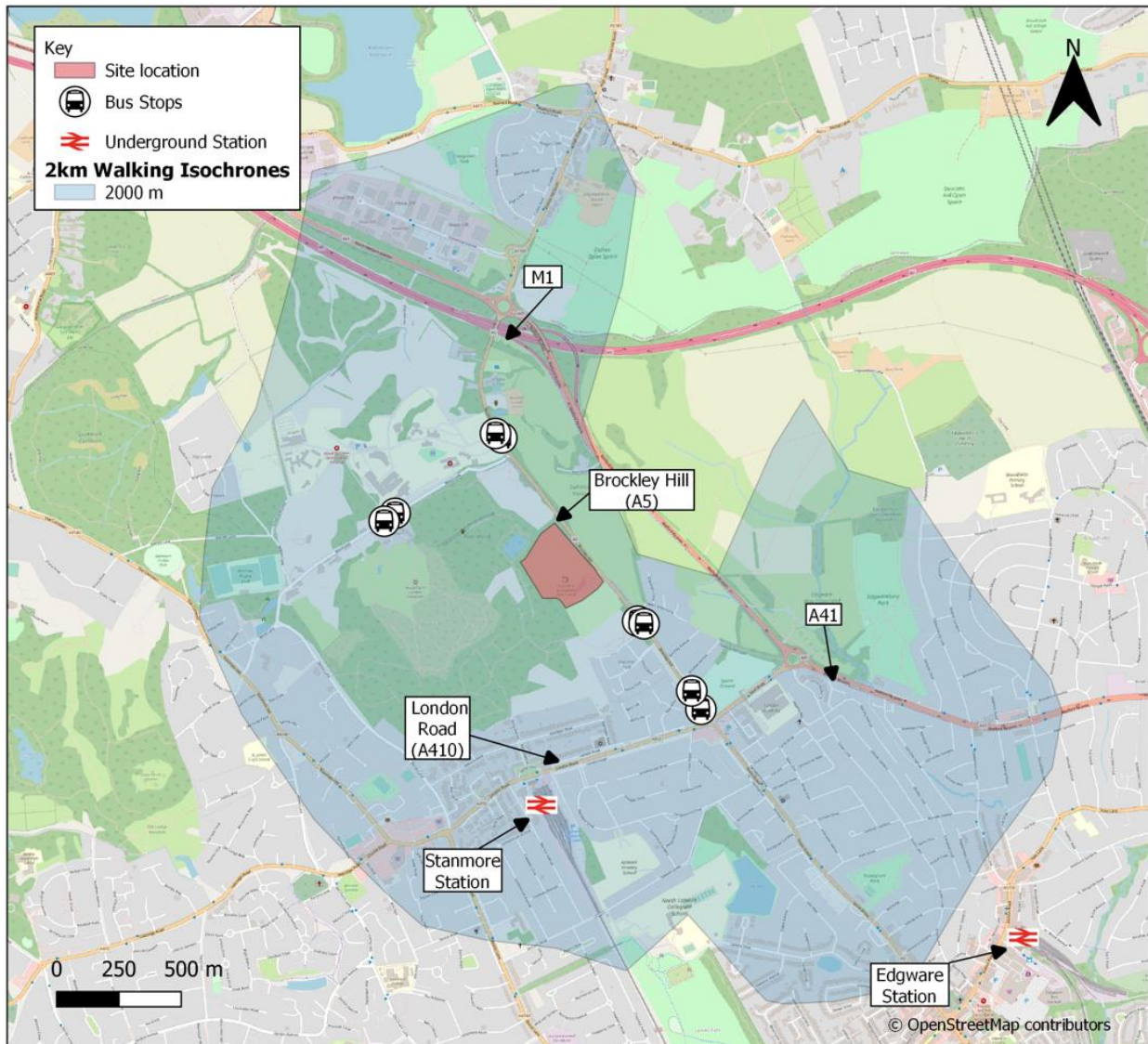
**Accessibility by Foot**

- 2.5 Although walking is not likely to be the chosen mode of transport for guests attending events such as weddings, this may represent a travel option for staff who reside within walking distance.



2.6 At **Figure 2.3** below I have shown the 2km walking isochrone which translates to a circa 20–25-minute walking time. As can be seen, some residential areas to the south of the site are within walking distance.

**Figure 2.3: A 2km Walking Isochrone**



2.7 There is a continuous footway on the west side of Brockley Hill that facilitates access on foot.

**Accessibility by Cycle**

2.8 As with walking, I consider it unlikely that guests will travel by bike to the venue. However, there is the opportunity for staff to use this mode.

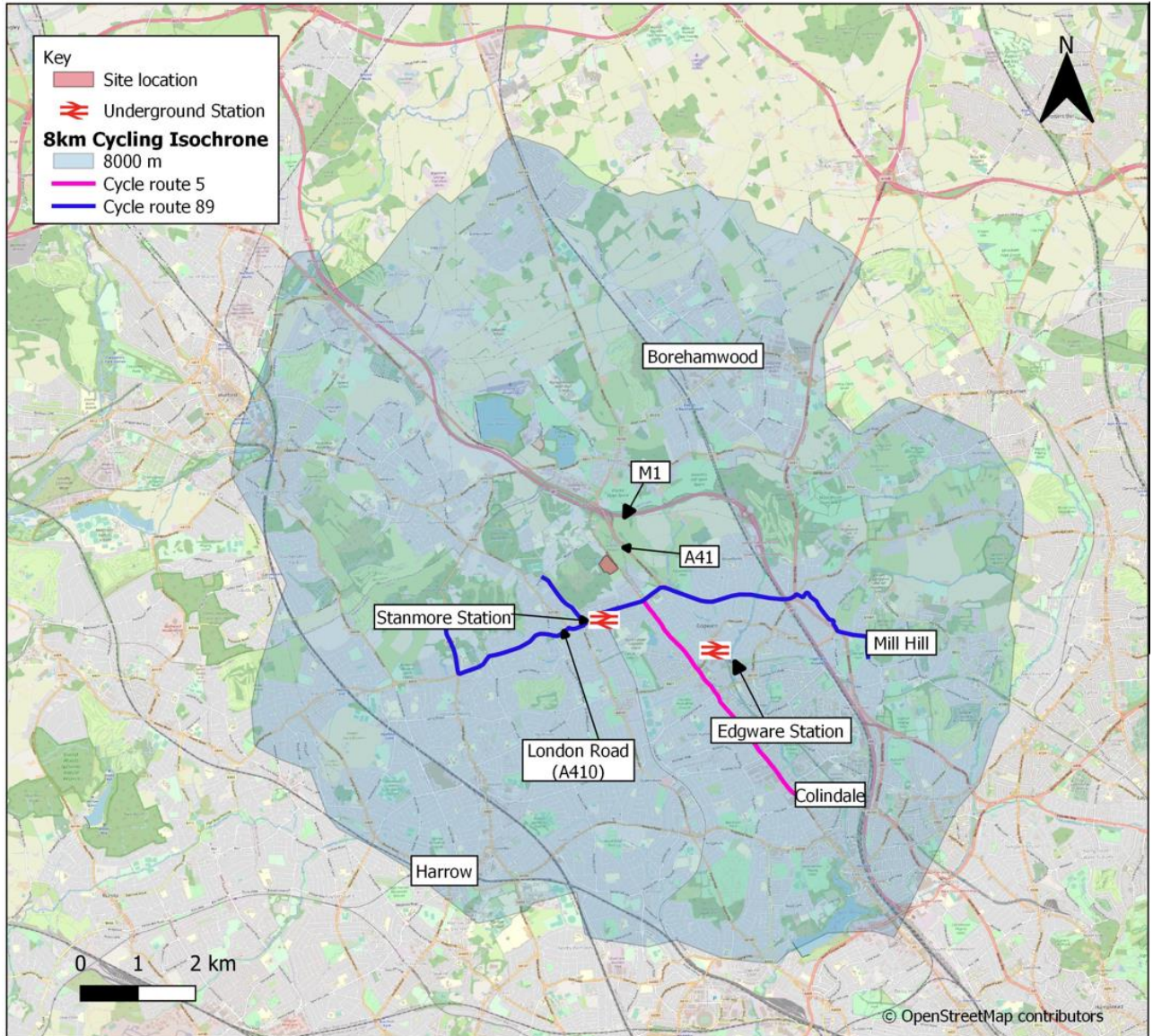
2.9 LCN (London Cycle Network) Routes 89 and 5 run within close proximity to the site, and largely comprise on-street lanes, or shared surfaces (with pedestrians).

2.10 At **Figure 2.4** I have shown the 8km (5 mile) cycling isochrone and Cycle routes 89 and 5. This is considered an acceptable cycle distance as per DfT’s Cycle Infrastructure Design (October 2008)

guidance which states that ‘many utility cycle journeys are under three miles (ECF,1998), although, for commuter journeys, a trip distance of over five miles (8km) is not uncommon’.

2.11 As can be seen this includes more extensive residential areas to the south of the site.

**Figure 2.4: 8km Cycling Isochrone**



**Accessibility by Public Transport**

**Bus Services**

2.12 The nearest bus stops are provided approximately 300m to the south of the site on Brockley Hill, just past the roundabout junction with Pipers Green Lane. The stops closest to the site service the 107 and 324 buses. These provide access to Stanmore Station, Edgware Bus Station and New Barnet. In addition, the stop at Canons Corner, further south of Brockley Hill, is served by the 142 which gives access to the following areas along Stone Grove: Farnsworth Drive, Park Grove on the service

towards Burnt Oak and Colindale and further residential roads towards Mill Hill. This stop is 900m/11 minutes from the site.

2.13 I summarise the local bus services in the table below.

**Table 2.1 - Bus services**

Service	Route	Ave Weekday Frequency
107	Edgware Bus Station- New Barnet Station	Every 15 mins
324	Centennial Park- Pipers Green Lane- Stanburn Primary School- Buck Lane- Clovelly Avenue- Tesco Brent Cross	Every 20 mins
142	Watford Junction Station- Mill Ridge-Park Grove- Manor Park Crescent – Burnt Oak Broadway- Colindale Avenue- Brent Cross Shopping Centre	Every 10-11 mins

### **Underground Services**

2.14 Stanmore Underground Station is located 1.6 km from the site which equates to a circa 20-minute walk or 5-minute cycle. Passengers can also use the 324-bus service that gives access to the stops close to the site.

2.15 Stanmore Underground Station provides Jubilee Line services towards Stratford. Interchange is possible with many other lines as the Jubilee Line runs through central London.

### **Section Summary**

2.16 In summary, it can be seen that the site had a previous use as a golf centre which generated traffic movements in the area.

2.17 The site is accessible by walking, cycling and bus services with underground services at Stanmore station within 2km of the site. I will discuss later in this proof how this accessibility is of assistance to staff and guests travelling to and from the site.

### 3 Planning Policy

3.1 In this section I provide a summary of the current transport-related policy most relevant to the development proposals at national and local level, including those identified in Reason for Refusal 3. A detailed review of current transport planning policy is provided within the EAS Transport Assessment (dated January 2021) (CD 68).

3.2 I have considered the following documents:

- I. National Planning Policy Framework NPPF (July 2021) (CD 1)
- II. The London Plan (March 2021) (CD 2)
- III. Harrow Local Plan – Core Strategy (2012) (CD 4)
- IV. Harrow Local Plan – Development Management Policies (2013) (CD 3)

#### National Policy

##### National Planning Policy Framework (NPPF), (July 2021)

3.3 The current version of the National Planning Policy Framework (NPPF) was published by the Ministry of Housing, Communities and Local Government in July 2021. The NPPF sets out the Government’s planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced.

3.4 In section 9 of the policy framework, paragraph 104 states that:

*“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*

- a) the potential impacts of development on transport networks can be addressed;*
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed, and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) patterns of movement, streets, parking, and other transport considerations are integral to the design of schemes and contribute to making high quality places.”*

3.5 Paragraph 105 goes on to state that:

*“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”*

3.6 Paragraph 106 advises planning policies should:

*“a) support an appropriate mix of uses across the area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;*

*b) be prepared with the active involvement of local highway authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned. [...]*

*[...] d) provide for attractive and well-designed walking and cycling networks with supporting facilities and secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans) [...]*”

3.7 Paragraph 110 states that:

*“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 Code; 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.*

3.8 Paragraph 111 states:

*“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highways safety, or the residual cumulative impacts on the road network would be severe.”*

3.9 Paragraph 112 states that:

*“Within this context, applications for development should:*

*a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality*

*public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*

*b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*

*c) create places that are safe, secure, and attractive – which minimise the scope for conflicts between pedestrians, cyclists, and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*

*d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and;*

*e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible, and convenient locations.”*

## **Regional Policy**

### **London Plan (March 2021)**

3.10 The London Plan (March 2021) replaces all iterations of the previous London Plans for the period of 2019 to 2041. As the overall strategic plan for London, it sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20 – 25 years.

3.11 Chapter 10 of the London Plan focusses on Transport policies. Policy T1 ‘Strategic approach to transport’ states that:

*“A Development Plan should support, and development proposals should facilitate:*

- the delivery of the Mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041*
- the proposed transport schemes set out in Table 10.1.*

*All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London’s transport networks and supporting infrastructure are mitigated.”*

3.12 Policy T4 on ‘Assessing and mitigating transport impacts’ states:

*“A Development Plans and development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.*

*B When required in accordance with national or local guidance, transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking*

*Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance.*

*C Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.*

*D Where the ability to absorb increased travel demand through active travel modes has been exhausted, existing public transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans and funding exist for an increase in capacity to cater for the increased demand, planning permission will be contingent on the provision of necessary public transport and active travel infrastructure.*

*E The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.*

*F Development proposals should not increase road danger.”*

3.13 Policy T6 relates to car parking provision. The policy is detailed below:

*“A Car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity.*

*B Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking (‘car-lite’). Car-free development has no general parking but should still provide disabled persons parking in line with Part E of this policy.*

*C An absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets.*

*D The maximum car parking standards set out in Policy T6 .1 Residential parking to Policy T6 .5 Non-residential disabled persons parking should be applied to development proposals and used to set local standards within Development Plans.*

*E Appropriate disabled persons parking for Blue Badge holders should be provided as set out in Policy T6 .1 Residential parking to Policy T6 .5 Non-residential disabled persons parking.*

*F Where provided, each motorcycle parking space should count towards the maximum for car parking spaces at all use classes.*

*G Where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles in line with Policy T6 .1 Residential parking, Policy T6 .2 Office Parking, Policy T6 .3 Retail parking, and Policy T6 .4 Hotel and leisure uses parking.*

*All operational parking should make this provision, including offering rapid charging. New or re-provided petrol filling stations should provide rapid charging hubs and/or hydrogen refuelling facilities.*

*H Where electric vehicle charging points are provided on-street, physical infrastructure should not negatively affect pedestrian amenity and should ideally be located off the footway. Where charging points are located on the footway, it must remain accessible to all those using it including disabled people.*

*I Adequate provision should be made for efficient deliveries and servicing and emergency access.*

*J A Parking Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed, with reference to Transport for London guidance on parking management and parking design.*

*K Boroughs that have adopted or wish to adopt more restrictive general or operational parking policies are supported, including borough-wide or other area-based car-free policies. Outer London boroughs wishing to adopt minimum residential parking standards through a Development Plan Document (within the maximum standards set out in Policy T6 .1 Residential parking) must only do so for parts of London that are PTAL 0-1. Inner London boroughs should not adopt minimum standards. Minimum standards are not appropriate for non-residential use classes in any part of London.*

*L Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London.”*

## **Local Policy**

### **Harrow Local Plan – Core Strategy (2012)**

- 3.14 Planning applications within the London Borough of Harrow are assessed against the policies set out in this document. The Core Strategy sets out the long-term vision for developing Harrow until 2026.
- 3.15 The key relevant policies contained within Core Policy CS1 are as follows:

#### Core Policy CS1 – Overarching Principles

*“Q) The Council will work with Transport for London and other appropriate authorities to secure enhancements to the capacity, accessibility and environmental quality of the transport network in accordance with the Local Investment Plan and to improve orbital connectivity between neighbouring boroughs. Highway investment will focus on junctions with identified existing or future capacity constraints where these support economic development or are needed to improve the reliability and general operating conditions of buses.*

*R) Parking for new development will be managed to contribute to the delivery of a modal shift from the private car to more sustainable modes. The Development Management Policies DPD will give*



*local interpretation of London Plan parking standards and detail requirements for sustainable Travel Plans.*

*S) Over development of sites with a low public transport accessibility rating will be resisted. Higher densities will be considered appropriate where the proposal involves the redevelopment of a previously developed site of strategic significance and can secure improvements to local transport sufficient to enhance the public transport accessibility level of the site.”*

### **Harrow Local Plan – Development Management Policies (2013)**

- 3.16 This document provides detailed policies in relation to the spatial strategy and overarching objectives of the Core Strategy.
- 3.17 Chapter 2 of the Development Management Policies relates to Character and Amenity, which aims to achieve a high standard of design and layout, preserving and enhance the quality of the Borough’s built environment.
- 3.18 More specifically, Policy DM1 on Achieving a High Standard of Development is detailed further below. Sub paragraphs (f) and (g) of section B are of most relevance to transport issues.

#### Policy DM1 – Achieving a High Standard of Development

*“A: All development and change of use proposals must achieve a high standard of design and layout. Proposals which fail to achieve a high standard of design and layout, or which are detrimental to local character and appearance, will be resisted.*

*B The assessment of the design and layout of proposals will have regard to:*

*a. the massing, bulk, scale and height of proposed buildings in relation to the location, the surroundings and any impact on neighbouring occupiers;*

*b. the appearance of proposed buildings, including but not limited to architectural inspiration, detailing, roof form, materials and colour, entrances, windows and the discreet accommodation of external services;*

*c. the context provided by neighbouring buildings and the local character and pattern of development;*

*d. the provision of appropriate space around buildings for setting and landscaping, as a resource for occupiers and to secure privacy and amenity;*

*e. the need to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit;*

*f. the functionality of the development including but not limited to the convenience and safety of internal circulation, parking and servicing (without dominating the appearance of the development) and the appearance, capacity, convenience, logistics and potential nuisance of arrangements for waste, recycling and composting; and*

*g. the arrangements for safe, sustainable and inclusive access and movement to and within the site.*

#### *Privacy and Amenity Considerations*

*C All development and change of use proposals must achieve a high standard of privacy and amenity. Proposals that would be detrimental to the privacy and amenity of neighbouring occupiers, or that would fail to achieve satisfactory privacy and amenity for future occupiers of development, will be resisted.*

[...]

*E. Development which would prejudice the future development of other parts of the site, adjoining land, or which would frustrate the delivery of adopted plans and allocated sites, will be resisted.”*

3.19 Chapter 9 relates to Transport and Waste, covering parking standards, transport plans, servicing, and waste management.

3.20 As noted, paragraph R of Policy CS1 of the Core Strategy relates to the strategic approach to parking across the borough. This is developed in more detail in Policy DM42 on ‘Parking Standards’, which states, so far as relevant.

#### Policy DM42 – Parking Standards

*A: Proposals that make on-site provision for parking will be supported where:*

- a. the number of vehicle parking spaces (including those with electric vehicle charging points) would have regard to the maximum London Plan Standards.*

[...]

*E: The design and layout of parking areas (including those for scooters, motorcycles and bicycles) should be safe, secure and fit for purpose. Access to and from the public highway should maintain and, where necessary, improve safety and give priority to the convenience of pedestrians and cyclists;*

*F: Proposals that would result in inappropriate on-site parking provision, having regard to the criteria in this policy, and those which would create significant on street parking problems, prejudice highway safety or diminish the convenience of pedestrians and cyclists, will be resisted.”*

3.21 Following on from this, Policy DM43 on ‘Transport Assessments and Travel Plans’ proclaims:

*“A. Proposals for major development will be required to submit a Transport Assessment for objective review by the Council. The Transport Assessment should quantify the impacts of the proposal upon public transport, the highway network, the cycle network and upon conditions for pedestrians (See Policy DM2: Achieving Lifetime Neighbourhoods). Where multiple major developments are proposed in the area, the Council will encourage developers to cooperate to assess the cumulative impacts of the proposals upon transport.*

*B. Proposals for major development will be required to satisfactorily mitigate the impacts identified in the Transport Assessment and any others arising from the Council's assessment of it. Mitigation measures will be required to contribute to the desirability of achieving modal shift away from private car use and should include the preparation and implementation of Travel Plans.*

*C. Proposals that fail to satisfactorily mitigate the transport impacts of development will be resisted.*

*D. Where necessary, construction logistic plans and delivery and servicing plans should be submitted with an application.”*

## Section Summary

3.22 I consider the key considerations to emerge from these policies are as follows:

- i) Policy advises that opportunities to promote walking, cycling and public transport use should be identified and pursued (NPPF para 104).
- ii) The London Plan (2021) states that the level of car parking should be determined on a case-by-case basis taking account of Policy T6 'Car parking', current and future PTAL and public transport provision, and walking and cycling connectivity.
- iii) Policy T6 also advises that the lack of on-street parking controls should not be a barrier to development coming forward.
- iv) The 'Overarching Principles' of LBH's Core Strategy Policy CS1 states that parking for new development will be managed to contribute to the delivery of a modal shift from the private car to more sustainable modes.
- v) Policy DM42 of LBH's Development Management Policies states that proposals will be supported if they comply with the London Plan parking requirements.
- vi) Policy DM43 of LBH's Development Management Policies states that developments need to satisfactorily mitigate their impacts.

3.23 I consider later in this proof how the development proposals comply with these policies.

## 4 Development Description

4.1 In this section I give a brief description of the development proposals, as they relate to transport, and the proposed transport infrastructure.

### Summary of the Proposed Development

4.2 The description of the proposed development is as follows :

*“Demolition of existing golf club buildings and construction of a single and two storey building for a banqueting facility; widening of existing vehicular access from Brockley Hill, car and cycle parking, waste/recycling storage, landscape enhancement and associated works”*

4.3 Full details of the scheme are contained in the Planning Statement (August 2020) (CD 43), Supplementary Planning Statement (January 2021) (CD 63), Design and Access Statement (August 2020) (CD 48 to 51) and Supplementary Design and Access Statement (January 2021) (CD 57) and I do not repeat those details here. However, I have provided below a summary of the key transport-related elements.

### Access

4.4 The existing site access will be amended to allow access and egress by all vehicles including coaches. The access will include an island to prevent right turns into the site (see **Appendix A**). Further details are shown in the Transport Assessment (Appendix F) (CD 68). This will lead to an improvement in safety compared with the existing situation since not only are the right turns prevented but also any possibility of queueing on Brockley Hill is removed.

4.5 It is also proposed to reduce the speed limit on Brockley Hill to 30mph which will also enhance safety.

4.6 A new footpath from the site into Brockley Hill, south of the vehicle access, will also be constructed to facilitate a pedestrian connection from the site to the wider network.

4.7 These proposals are agreed with LB Harrow and LB Barnet.

### Parking

4.8 The layout of the car park has been the subject of evolving design. The objective has been to maintain the pre-existing areas of hard standing but to improve the efficiency of the layout and the number of parking spaces available. As I will explain in Section 6 of this proof, car parking spaces will not be designated with white lining or similar road markings. Instead, there would be on-site management for every event to ensure guests park efficiently within the car parking area. Hence, where the plans I refer to below show spaces, they indicate where cars will be directed to park rather than marked out spaces.

4.9 The most recent site layouts produced by EAS are contained in the Parking Management Plan dated September 2021.

- 4.10 Since becoming involved in the project I have reviewed these layouts and, whilst I consider them to be sound and workable, I have developed some minor amendments which I consider enhance the capacity and operation of the site still further.
- 4.11 I have shown two ways in which cars could be parked. The first, is shown at Drawing 226759/PD01 Rev A that I have included at **Appendix A**. This layout does not involve any double parking of cars. As can be seen this provides a total of 109 spaces: 5 for staff and 104 for guests. I have referred to this as the standard layout.
- 4.12 The second way of parking cars utilises what I have referred to a “valet” spaces. These are spaces that block other spaces and hence a greater level of management is required. Such a layout is shown on Drawing No 226759/PD02 Rev A at **Appendix B**. This leads to the availability of 129 spaces: 5 for staff and 124 for guests.
- 4.13 I will explain in Section 6 of this proof how the car park will be managed.
- 4.14 Cycle and motorcycle parking is provided in accordance with London Plan Standards. There are 20 cycle spaces and 7 motorcycle spaces proposed.

#### **Coach and Taxi Drop-Off and Pick Up Facilities**

- 4.15 The car parking layouts, as shown at **Appendices A and B**, provide an area for coaches and taxis to drop-off and pick-up guests close to the building. Tracking, contained at **Appendix C**, has been provided to demonstrate how emergency vehicles will be able to access and egress the site whilst coaches are dropping-off and picking-up guests.
- 4.16 As I will explain in Section 6 of this proof, due to the measures to be included in the Car Park Management Plan (CPMP) (CD 76) it is highly unlikely that more than one coach will be on site at any one time. However, as shown in **Appendix C**, even if this were to occur, a second coach can wait in the car park for the first to complete guest drop-off or pick-up. Cars and taxis can still enter and leave the car park with access to only a few spaces impaired.
- 4.17 Taxis can enter the site and drop off / pick up close to the building entrance point. If there are multiple taxis at any one time then they may affect a few parking spaces but this will be managed by the on-site management parking team.

#### **Road Safety Audit**

- 4.18 A Stage 1 Road Safety Audit (included at CD 68) has been carried out for the proposed access, which identified two recommendations as follows:
- i) It recommended that the Design Team provide information regarding the potential U-turn routes expected to be taken by drivers approaching the site from the north. It is recommended that Auto Tracking is provided detailing whether these routes are suitable for all expected vehicle manoeuvres.
  - ii) It is recommended that the Design Team introduce a clear pedestrian crossing facility within the proposed traffic island.

- 4.19 With respect to the first item raised, all information associated with travel to the site will advise drivers to arrive from the south. It is noteworthy that anyone travelling south towards the site on the M1 will arrive from the south in any case since the M1/A41 junction has west facing slips only thus requiring drivers to use the A41/A410 junction to the south of the site.
- 4.20 A comprehensive signage scheme will be implemented as part of the highway works and speed reduction measures. It is proposed that this includes signage advising drivers to U-turn at the Brockley Hill/A410 roundabout.
- 4.21 With respect to the second item raised, a clear pedestrian crossing facility will be incorporated at the detailed design stage.

### **Summary**

- 4.22 In this section I have given a brief description of the development proposals and the proposed transport infrastructure.
- 4.23 In summary:
- i) The existing site access will be amended to prevent right turns into the site from the North on Brockley Hill, and the speed limit on Brockley Hill will be reduced to 30mph, as supported by LB Harrow/LB Barnet. Both of these measures will lead to safety benefits.
  - ii) New pedestrian infrastructure will be implemented on site to connect it to the wider network to the south of the site on Brockley Hill.
  - iii) The car park will be re-configured to provide appropriate parking as well as coach and taxi facilities.

## 5 Travel Characteristics

5.1 In this section I consider the likely travel characteristics of the proposed event venue. However, to set this in context I first consider the traffic that the previous golf club use would have generated.

### Previous Trip Generation – Golf Use

5.2 The estimated traffic generation of the previous use was set out in the Transport Assessment (CD 68) produced by EAS and used the industry standard TRICS database which is a database of surveys for different land uses. These estimates have not been disputed by the Council.

5.3 At **Table 5.1**, I summarise the agreed estimated traffic generation for the golf centre, during the periods of highest traffic flow on Brockley Hill and on a daily basis. I have done this for weekdays and weekend days.

**Table 5.1 - Existing Golf Use Weekday Trip Generation (TRICS)**

Trips (Trip per Driving range and per par 3 course hole)	Trip Generation		
	Arr	Dep	Total
Driving Range (Weekday 07:00-08:00)	7	0	7
Par 3 Course Hole (Weekday 07:00-08:00)	4	0	4
<b>Total Weekday (07:00-08:00)</b>	<b>11</b>	<b>0</b>	<b>11</b>
Driving Range (Weekday 08:00-09:00)	2	3	5
Par 3 Course Hole (Weekday 08:00-09:00)	11	2	13
<b>Total Weekday (08:00-09:00)</b>	<b>13</b>	<b>5</b>	<b>18</b>
Driving Range (Weekday 17:00-18:00)	16	17	33
Par 3 Course Hole (Weekday 17:00-18:00)	1	9	10
<b>Total Weekday (17:00-18:00)</b>	<b>17</b>	<b>26</b>	<b>43</b>
Driving Range (Weekday 18:00-19:00)	16	10	26
Par 3 Course Hole (Weekday 18:00-19:00)	0	1	1
<b>Total Weekday (18:00-19:00)</b>	<b>16</b>	<b>11</b>	<b>27</b>
Driving Range (Weekday Daily)	172	168	340
Par 3 Course Hole (Weekday Daily)	75	77	152
<b>Total Weekday (Weekday Daily)</b>	<b>247</b>	<b>245</b>	<b>492</b>
Driving Range (Weekend 13:00-14:00)	45	46	91
Par 3 Course Hole (Weekend 13:00-14:00)	7	7	14
<b>Total Weekend (13:00-14:00)</b>	<b>52</b>	<b>53</b>	<b>105</b>
Driving Range (Weekend 14:00-15:00)	62	45	107
Par 3 Course Hole (Weekend 14:00-15:00)	8	9	18
<b>Total Weekend (14:00-15:00)</b>	<b>70</b>	<b>54</b>	<b>125</b>
Driving Range (Weekend 15:00-16:00)	49	52	101
Par 3 Course Hole (Weekend 15:00-16:00)	7	7	15

Trips (Trip per Driving range and per par 3 course hole)	Trip Generation		
	Arr	Dep	Total
<b>Total Weekend (15:00-16:00)</b>	<b>56</b>	<b>59</b>	<b>115</b>
Driving Range (Weekend Daily)	487	485	972
Par 3 Course Hole (Weekend Daily)	59	60	119
<b>Total Weekend (Weekend Daily)</b>	<b>546</b>	<b>545</b>	<b>1,091</b>

*Errors due to rounding*

- 5.4 As shown in **Table 5.1**, the existing golf course is estimated to have generated the highest number of trips during the weekend peak hours of 14:00-15:00, resulting in 125 two-way trips. Trips across the weekend range from 115 to 125 two-way trips per hour.
- 5.5 In regard to daily traffic generation, the existing site is estimated to have generated 492 two-way trips on a weekday, and 1,091 two-way trips on a weekend.

### **Proposed Event Venue – Likely Modes of Travel**

- 5.6 There are a number of ways in which staff and guests can travel to the site.

**Walking and Cycling:** As I have set out in Section 2, this is an option for a local catchment.

**Bus services:** I have summarised the available bus services at Section 2. Services cover certain areas in north London and also, importantly, provide a link to Stanmore station.

**Underground:** The Jubilee line service via Stanmore station links to other lines and provides links to a wide catchment within London within an hour’s journey time. As I have indicated below, when describing the Travel Plan measures, a free taxi between the station and the site will be provided by the site owner/operator and this will act as a further incentive to use the underground.

**Coach:** Especially for larger events and for groups travelling from further afield, coach travel provides a practical and economic mode;

**Car:** It is inevitable that a significant proportion of staff will travel to the site by car. However, this is likely to be in family and friendship groups with a high level of car occupancy.

- 5.7 A Travel Plan (dated August 2020) (CD 85) was submitted as part of the application. An updated plan will be submitted to Harrow Council for their approval at least 6 months prior to the first event being held. The key elements of the plan are listed in the S106 Obligation and are as follows:
- i) issuing of a travel information sheet to all guests and staff showing different travel options for gaining access to the Site. This will allow guests to make an informed choice and will highlight the public transport options (bus and underground), free taxi availability etc. The information will also include advice to car drivers on the best route to use to access the site (i.e., approaching from the south)
  - ii) travel information to be available on the Owner's website. The information highlighted above will be available on the website;



- iii) free taxi travel for guests and staff between Stanmore Underground Station and the Site. This will be provided by the owner/operator of the site through an arrangement with a local taxi company. For example, there is a taxi company based in the station;
- iv) a shuttle bus to transport staff from local areas and stations to the site if there is sufficient demand. If there are concentrations of staff then it may be practical to provide a direct free shuttle bus between those areas and the site;
- v) guaranteed free ride home (via either shuttle bus or taxi) for staff if public transport is not available at the time of travel. This is particularly helpful for those who may be working late at night; and
- vi) targets for the reduction in the number of car drivers accessing the site. The Travel Plan will include targets to reduce the number of people driving to the site by car (although a good level of car sharing is a sustainable method of travel)

**Travel Surveys**

5.8 As detailed in EAS Transport Assessment (CD 68), in the absence of TRICS surveys, data was drawn out from the 2019 events schedule and travel surveys that were undertaken in 2019 at the previous Premier Banqueting venue. This data was used to ascertain event frequency, the numbers attending such events, the start and finish times and mode of travel.

Event Frequency

5.9 The data shows that there were 185 events at the previous venue in 2019, equating to around one event every two days. On circa 20 days over the year there were two events on a single day: a lunchtime and an evening event. Events were held on around 80% of Saturdays, 55% of Sundays and on average on 1.8 weekdays per week.

5.10 The events schedule for a typical fortnight is summarised below:

**Table 5.2 – Premier Banqueting London Ltd typical fortnight events schedule**

Day	Event Start Time	Event Finish Time	Attendance
Monday	-	-	-
Tuesday	-	-	-
Wednesday	-	-	-
Thursday	18:00	00:00	300
Friday	18:00	01:00	200
Saturday	10:00	16:00	450
Sunday	18:00	01:00	400
Monday	-	-	-
Tuesday	18:00	00:00	250
Wednesday	-	-	-

Day	Event Start Time	Event Finish Time	Attendance
Thursday	-	-	-
Friday	18:00	00:00	350
Saturday	18:00	00:00	350
Sunday	11:00	16:00	400

### Mode of Travel

- 5.11 Mode of travel, vehicle occupancy, plus guest arrival and departure times were determined through completion of a guest travel survey by attendees of two events at the previous Premier Banqueting venue.
- 5.12 The survey was completed by guests attending events on Thursday 16<sup>th</sup> and Friday 17<sup>th</sup> January 2020. These respectively represented a small and a large event, attended by circa 65 and 500 guests, all of whom were surveyed at each event. I have summarised the results of the surveys below:
- 5.13 For the small (65 person) event the mode of travel was as follows:
- i) 12 cars transporting 39 guests (3.25 guests/car). Hence **60% car mode share**;
  - ii) 5 taxis transporting 20 guests (4 guests/taxi). Hence **31% taxi mode share**;
  - iii) Circa 6 guests also travelled to site by bus. Hence **9% bus mode share**.
- 5.14 The 500 guests that attended the large (500 guest) event travelled to the venue using:
- i) 39 cars transporting 133 guests (3.41 guests/car). Hence **27% car mode share**;
  - ii) 12 taxis transporting 53 guests (4.42 guests/taxi). Hence **11% taxi mode share**;
  - iii) 11 coaches transporting 304 guests (27.64 guests/coach). Hence **60% coach mode share**;
  - iv) Circa 10 guests also travelled to the site by bus or train. Hence **2% public transport mode share**
- 5.15 The above figures illustrate how events with more attendees involve greater use of coaches, as well as slightly higher rates of car and taxi occupancy (i.e., number of guests per vehicle). The average car occupancy across both events was 3.37.
- 5.16 Additional surveys, provided at **Appendix D**, were undertaken, post pandemic, for 5 events during March/April 2022. The results of those surveys indicate the following for 244 people surveyed:
- Car Mode Share: 67%
- Taxi Mode Share: 18%

Coach Mode Share: 15%

- 5.17 It should be noted that because of the form of the survey, those arriving by public transport were not surveyed. The surveys confirmed car occupancy of 3.3.
- 5.18 Only one of the events recorded was a larger (500 person) event and hence these figures are more comparable with the smaller event surveyed in 2019.

**Proposed Event Trip Generation - Guests**

- 5.19 I have used the above information to derive estimates of likely event trips by different modes and the relationship between this and the available car parking.
- 5.20 For a 500-person event, the Travel Survey indicated 39 cars being used to transport guests to the venue and hence the need for 39 car parking spaces on site. This parking demand will be comfortably accommodated within the spaces that would be available on site (a minimum of 104 guest spaces).
- 5.21 However, it may be that there would be variations in the level of coach, taxi and public transport use between different events and I have therefore considered some alternative mode splits.
- 5.22 I have considered, first, an event of 300 guests. This is the average size of event as recorded at the previous Premier Banqueting operation between 2014 and 2019.
- 5.23 Let us assume that all guests come by car with no coach, taxi or public transport use. In this case all the parking demand could be accommodated in the 104 standard spaces (i.e., without the use of any “valet” spaces) if the car park occupancy were 2.9. This is a considerably lower car occupancy than recorded in the surveys I have referred to above.
- 5.24 Secondly, I have considered an event of 350 guests. In this case, again if all guests came by car, all demand could be accommodated in the 104 standard spaces with a car occupancy of 3.37 (which is the average occupancy across the 2 previous events surveyed). Or, if the valet spaces were used, taking the available guest spaces up to 124, then the car occupancy could be as low as 2.8 and all car parking demand could still be accommodated on site.
- 5.25 Thirdly, I have considered an event for 500 guests. If the maximum number of standard parking spaces on the site are used (104), a potential modal share would be as follows:

**Table 5.3 - 500 Person Event: Standard Car Parking Spaces (104)**

Mode of Travel	Vehicles	Vehicle Occupancy	Guests	Modal Share
Cars	100	3.25	325	65%
Coach	5	25	125	25%
Taxi	6	4.2	25	5%
Public Transport	Nil	N/A	25	5%

- 5.26 To derive these figures, I have assumed a car occupancy of 3.25 which I consider reasonable for weddings and similar events and is supported by the survey data. On this basis there would only need to be 125 people arriving by coach and 25 by taxi for the car demand to be accommodated within the standard spaces, with no use of valet parking. This is approximately half the proportion using these modes derived from the survey of the larger event. The car modal share at 65% is almost two and a half times that recorded in the survey.
- 5.27 Finally, I have considered the situation if the valet spaces are used. In this case 124 guest spaces would be available. Undertaking a similar exercise leads to the following figures:

**Table 5.4 - 500 Person Event: Valet Car Parking Spaces (124)**

Mode of Travel	Vehicles	Vehicle Occupancy	Guests	Modal Share
Cars	124	3	375	75%
Coach	3	25	75	15%
Taxi	6	4.2	25	5%
Public Transport	Nil	N/A	25	5%

- 5.28 As can be seen in this scenario 75% of guests could arrive by car (well in excess of either of the surveys) with a conservative car occupancy assumption of 3. Only 15% are assumed to arrive by coach, 5% by taxi and 5% by public transport.
- 5.29 The above demonstrates that it is highly likely that all of the parking generated by a 500-person event can be accommodated within the parking spaces available on site, possibly with the use of the valet spaces but usually without.
- 5.30 The above analysis demonstrates the following:
- i) For a 300-guest event all parking demand should be accommodated on site using only standard spaces and no valet parking is likely to be required. This assumes all guests arrive by car and a car occupancy of 2.9;
  - ii) For a 350-guest event it is very likely that all parking demand will be accommodated using only standard spaces, even if all guests arrive by car. If the “valet” parking spaces are used all parking can be accommodated on site even if all guests come by car and the vehicle occupancy is only 2.7;
  - iii) For a 500-guest event, using assumptions that are more conservative than the results of the surveys, all parking can be accommodated on site either using just the standard spaces or utilising the “valet” spaces, depending on the exact modal split for the event.

**Proposed Event Venue Trip Generation – Staff**

- 5.31 In relation to staff travel, only 5 car parking spaces for staff will be provided. It is therefore expected that the great majority of staff will travel by other means. This is likely to comprise:
- i) Walking and cycling from the local catchment;

- ii) Use of local bus services;
- iii) Underground to Stanmore and then a bus or free taxi;
- iv) Free shuttle bus if there is sufficient demand.

5.32 For a larger event, as set out in the TA (CD 68), I have assumed there would be circa 30 staff. I would expect these to arrive in approximately the following proportions:

- i) Car: 10 staff (circa 2 staff per vehicle) ;
- ii) Walking/cycling/bus: 12 staff
- iii) Underground: 8 staff

5.33 Therefore, in terms of traffic generation, the staff are likely to generate circa 6 movements in and 6 out over the course of an event (based on assuming, in each case, 5 movements by car and 1 movement by taxi).

**Traffic Generation – Comparison with Existing Site Use**

5.34 Considering the guest and staff travel outlined above, in the case of a 500-person event one could have circa 133 guest vehicles (cars + coaches + taxis) and 6 staff vehicles arriving at and leaving the site i.e., circa 140 vehicular movements both in and out, resulting in a total of 280 two-way movements for the event as a whole. This is considerably less than is estimated to have been generated by the previous golf club use over a weekday (490 movements) or weekend day (1090 movements).

5.35 There might be a relatively small number of occasions when there would be two events per day. In this instance I have assumed one 300 guest event and one 500 guest event. In this case, it would be anticipated the same staff would work at both events and therefore only the guest travel would increase. Hence the movements would be:

- i) 300 guest event: 208 guest vehicle movements
- ii) 500 guest event: 266 guest vehicle movements
- iii) Staff: 12 vehicle movements
- iv) Total: 486 vehicle movements

5.36 This number of movements is still less than would have been generated by the previous golf use during the week and considerably less than at the weekend.

5.37 It is important to remember these movements will be spread over a number of hours. As has been agreed with the Council, this will not have any unacceptable impacts on the surrounding highway network.

## **Section Summary**

- 5.38 I conclude the following:
- 5.39 The site was previously used as a golf centre and generated traffic on the surrounding highway network.
- 5.40 For the proposed use, there are a number of ways in which the site will be accessed by guests on event days. These comprise:
- i) Walking and cycling;
  - ii) Public transport (including Stanmore station);
  - iii) Coaches; and,
  - iv) Private car.
- 5.41 A comprehensive Travel Plan will be introduced that encourages guests to travel by the most appropriate means and this information will be made available to all guests.
- 5.42 Based on the surveys undertaken at the current Premier Banqueting venue, it is estimated that even for a 500-person event, the car parking demand can be accommodated on site.

## 6 Scheme Operations

6.1 Building on the travel characteristics that I have explained in the previous section, in this section of my proof I explain how the venue will be managed on event days to maximise the efficiency of the car park and minimise the chance of any adverse impacts on the surrounding highway network and residential amenity. These measures will be encapsulated in two documents as follows:

- i) A **Car Park Management Plan** which will be submitted to the Council for approval 6 months prior to the first event; and
- ii) An **Event Management Plan** which will be submitted to the Council 3 months prior to a planned large event. A large event is defined as any event with more than 350 guests attending.

### Car Park Management Plan (CPMP)

6.2 The CPMP will contain the following measures which will apply to all events.

6.3 **Information Provision:** Information on travel choices will be made available to all guests. This will advise that car parking is available on the site, and that they should not park on adjacent streets.

6.4 **Car Park Booking System:** Guests will be requested to book a car parking space via a website or mobile telephone app, which will secure their parking space and will also provide information to the management of the venue on the likely car parking demand in advance of an event.

6.5 The company 'Chantry' has provided its Parkspace system for a number of years, including for wedding venues and similar events. I have included a 'Statement of Intent' from Chantry at **Appendix E**, which summarises the suitability of the Parkspace system and its app-based technology for the proposed development.

6.6 In brief, the Parkspace system would be hosted on the venue's website, allowing guests to book parking at no cost (with the venue paying Chantry a fee for using the system). The number of bookable spaces would then be managed as necessary by the venue management.

6.7 **On-site Car Park Management:** A professional and experienced car park management company will be engaged at for all events. The level of management required will vary depending on the event size. For example, for all but the large events (i.e., those with less than 350 guests) valet parking is unlikely to be required and the parking marshals will simply direct drivers to the standard spaces and marshal coaches and taxis. Spaces will be filled on a sequential basis, avoiding the delay that would otherwise be caused by people "searching" for a space. This will ensure efficient use of space and ensure the maximum number of vehicles can be accommodated on site. For larger events (i.e., with 350 guests or more), more marshals would be employed and would, if necessary, utilise the valet parking spaces, parking the cars for guests if necessary. The keys would be left with the valet company, allowing them to move cars during the event if needed.

6.8 EAS previously approached a valet parking service company on behalf the appellant. ValetParked is a professional valet company which provides a complete service to facilitate the smooth operation of parking management, including associated services such as managing taxi/coach arrivals.

ValetParked has provided services for a range of venues and has expressed their interest in providing a valet service to the applicant through the proposal included at **Appendix F**.

- 6.9 **Coaches:** Coach travel will be managed by the venue. Liaison will take place with any coach company /companies to ensure that only one coach arrives at the site at any one time. Coaches will be parked off-site at a suitable location. Coach companies will be advised of suitable nearby locations.
- 6.10 **Taxis:** As I explained in Section 4, taxis can enter the site and drop off / pick up close to the building entrance point and will be managed by the on-site car park management team.

### **Event Management Plan**

- 6.11 I consider the management regime as set out above to be practical, effective and appropriate for the venue and likely guest demand. In particular, employment of a professional valet parking company will secure the smooth operation of the car park.
- 6.12 However, in the very unlikely event that parking demand exceeds supply on site, an overspill parking regime would be implemented. Cars would be taken off site by the valet company (who have qualified and experienced drivers) and returned when guests require them.
- 6.13 It is intended to have a number of potential overspill car parks available utilising existing car parking stock.
- 6.14 The exact locations to be made available for each event attracting more than 350 guests will be confirmed within the **Event Management Plan** to be submitted to the Council 3 months prior to any such event taking place.

### **Parking Controls**

- 6.15 In view of the measures that I have set out above, I consider it highly unlikely that those attending events at the site would park their cars in surrounding streets. However, there are two ways in which this could be mitigated if it occurred.
- 6.16 The first relates to the Council's concern about parking on Brockley Hill, and this potentially giving rise to safety concerns. To overcome this, the Appellant would be willing, in principle, to cover the costs of monitoring any unexpected attempts to park on Brockley Hill when the development is operational and then contribute towards the cost of the Council introducing parking controls on Brockley Hill should monitoring demonstrate that to be required. The Appellant will continue to engage with the Council on this issue between now and the inquiry.
- 6.17 The second potential mitigation relates to the concern about parking taking place in local residential streets and being disruptive to residents. In the very unlikely event that this were to take place, then the Council would have the option of introducing parking controls on event days that permit those with a permit (i.e., residents) to park but prevent others from doing so. London Plan Policy T6 (C) advises that development should not be prevented due to the lack of on-street parking controls and it is for the authorities to introduce controls if necessary (following appropriate consultation).



## **Section Summary**

- 6.18 In this section I have explained how the venue will be managed on event days.
- 6.19 A Car Park Management Plan will be submitted to the Council in advance of the first event and will apply to all events. This will manage on-site operations in a way that is proportionate to the size of the event. It will make provision for directing guests to car parking spaces, utilising the “valet” spaces if necessary, and managing coaches and taxis.
- 6.20 For larger events (with 350 guests or more attending) an Event Management Plan will be submitted to the Council in advance of each event. This will detail the overspill parking that will be made available, in the unlikely event that it is needed.
- 6.21 In addition to the above, the appellant is willing to cover the costs of monitoring any unexpected attempts to park Brockley Hill and, if deemed necessary, contribute towards the implementation of parking controls.
- 6.22 Finally, if any parking did take place on residential streets, the Council has the powers to implement parking controls on event days.

## 7 Reasons for Refusal

- 7.1 In this section I consider the transport-related Reasons for Refusal (RfR) included within the decision notice (CD 81) from LBH.
- 7.2 Reason for Refusal 3 states:
- “The proposed development, by reason of failure to provide adequate on site or off-site car / coach parking and lack of integrated drop off facilities to serve the proposed banqueting facility, would significantly intensify site usage and generated trips. The associated likely on-site congestion and parking overspill into the London Borough of Harrow and the London Borough of Barnet, with particular reference to the residential streets to the south-east of the site, is therefore considered to be detrimental to highway and pedestrian safety, and the amenities of neighbouring occupiers, contrary to the National Planning Policy Framework (2021), Policy T4 of the London Plan (2021) and policies DM 42 E and F, DM 1 B (f) (C) and D (h), policy DM 42 E and F and DM 43 B and C of the Harrow Development Management policies Local Plan (2013).”*
- 7.3 In Section 4 of my proof, I have described an optimised layout for the car park which provides a higher number of permanent and valet car parking spaces compared with the previous layouts considered. In Section 5 I have demonstrated that, using reasonable assumptions based on the evidence from the previous venue, car parking demand from a 500-person event can be accommodated on site. In fact, some of the assumptions I have made on coach and taxi use are conservative. A comprehensive Travel Plan will be implemented that will encourage guests and staff to use sustainable modes so as to manage car parking demand. Hence, I do not consider that there has been a *“failure to provide adequate on site or off-site parking”*
- 7.4 In terms of *“integrated drop off facilities”*, I have demonstrated in Section 4 and 6 that coaches and taxis can be accommodated on site. Furthermore, use of a professional event car park management company will lead to the efficient and safe use of the space. This will be set out in the Car Park Management Plan.
- 7.5 On this basis it is not anticipated that there would be any on-site congestion nor parking overspill into adjacent streets. However, in the very unlikely event that parking demand were greater than supply for a particular event, a range of overspill car parks will be available for use and these will be included in the detailed Event Management Plan to be submitted to the Council for approval prior to any event with more than 350 guests.
- 7.6 In relation to Brockley Hill, as noted above, I do not anticipate any parking on the road in view of the parking management measures to be taken on-site. However, the s. 106 obligation could make provision to monitor this and include a commitment to contribute towards the introduction of parking controls if shown by monitoring to be necessary. The Appellant will continue to engage constructively with the Council on this issue between now and the inquiry.
- 7.7 Finally, as I have indicated in Section 6, London Plan Policy T6 advises that development should not be prevented on account of a lack of on-street parking controls and LB Harrow and LB Barnet could introduce event day controls in nearby residential streets if deemed necessary.

## **Section Summary**

7.8 In summary, I consider that the objections raised by the Council in Reason for Refusal 3 have been addressed by:

- i) The scheme layout;
- ii) The Car Park Management Plan;
- iii) The Event Management Plan (covering overspill parking);
- iv) Provisions for parking restrictions on Brockley Hill if there is an evidenced need;
- v) The ability of the councils to introduce event day parking controls in residential streets in the very unlikely event of such a need arising

## 8 Third Party Objectors

- 8.1 In this section I consider documents submitted by third parties including local residents and members of the public.
- 8.2 I have identified the following common themes in the transport-related objections from third parties:
- I. Congestion and Pollution;
  - II. Highway Safety;
  - III. Parking;
  - IV. Sustainability and Active Travel Provision; and,
  - V. Other Transport Consultants' Technical Notes.
- 8.3 Under each theme I shall note down key points made within the objections and provide my response.

### **Congestion and Pollution**

- 8.4 The key concerns from objectors regarding the impact of the proposals on congestion and pollution can be summarised as follows:
- i) The proposed development will contribute to congestion already present on the local road network and will result in increased pollution, with a focus on Cannons Corner Roundabout, Brockley Hill, London Road.
  - ii) Area is already overdeveloped with the Academy and Estate on Spur Road without improvement to the road system.
  - iii) Unlikely that any improvement to traffic on London Road can be achieved, as this is a single lane highway between the traffic light junction with Honeypot Lane.
  - iv) Proposed left-in-left-out entry will lead to doubling of road journeys to the two roundabouts at Cannons Corner and A41 for all traffic arriving from the north or south.
  - v) Usage of diesel vans and coaches resulting in increased air pollution.
  - vi) Roads surrounding the development area are already too congested for event more traffic especially on Wembley event days.
  - vii) The applicant's TA greatly overestimates traffic flow associated with the golf club and therefore downplays the traffic impact of the proposed development.
  - viii) If the application had used more accurate traffic data for the golf club, then the assessment would show a clear increase in traffic flow associated with the proposed development.

8.5 The data relating to the previous trip generation and the consequent projection of traffic generated by the proposal has been accepted by LB Harrow and LB Barnet. The industry standard TRICS database was interrogated to obtain survey data for similar sites in order to demonstrate the potential number of trips generated by the previous use. This methodology is widely accepted within the industry and provides the best available indication of the likely number of movements.

8.6 I have provided in Section 5 above an analysis that demonstrates that a 500-guest event or a combination of a 500 and 300 guest event on a single day would generate less traffic than the previous golf use. Hence the development will not contribute to increased traffic congestion or pollution. The objections state that improvements to the road network are unlikely to be achievable. No capacity improvements are necessary as there is no additional traffic generation. In fact, safety improvements are proposed by banning right turns into the site and reducing the speed on Brockley Hill.

### **Highway Safety**

8.7 Third party objectors also raised concerns about the impact of the proposed development on highway safety. These concerns are summarised below:

- i) Original premise of this development was that most guests would arrive by coaches. The latest proposal of increasing the parking numbers on site would actually result in blocking the access for coaches as well as the ability for coaches to park on site. This not only contradicts their TA but also has a significant impact on the movement of emergency vehicles within the site.
- ii) The existing accident record on the surrounding highway would be exacerbated by the proposal leading to increased traffic flow and conflicting traffic movements (u-turners) on the surrounding highway.
- iii) Access is dangerous – cars will have to egress onto a dangerous main road.
- iv) The Pipers Green Roundabout is not designed for the volume, size and intensity of use proposed and no changes to the Roundabout are proposed.
- v) Management Plan fails to address issues raised in the Road Safety Audit including principally U-turners at the Pipers Green Mini Roundabout.

8.8 As I have demonstrated in Sections 4 and 6 of my proof, the site layout can incorporate a coach drop-off and still facilitate access by cars and emergency vehicles. Whilst the CPMP specifies that only one coach would be on site at any one time, even if 2 coaches were on site at once, cars and emergency vehicles could still access safely.

8.9 Safety measures have been proposed on Brockley Hill including prohibiting the right turn in to the site and reducing the speed limit to 30mph to improve safety. This has been agreed with LB Harrow and LB Barnet.

8.10 In regard to the Road Safety Audit, it is not anticipated that U-turns would take place at the Pipers Green Mini Roundabout due to its size. Routing information will be provided to guests advising

them to approach the site from the south. Signage will also be introduced advising drivers to U-turn at the Canons Corner roundabout. It is agreed with the Council that these measures can be agreed at detailed design stage.

## **Parking**

- 8.11 The key concerns expressed by objectors about the impact of the proposals on parking can be summarised as follows:
- i) The Parking Management Plan (PMP) is unworkable/unenforceable because the applicant has failed to provide any detailed information regarding certainty and availability of alternative offsite parking demonstrating that the applicant is not committed to providing an appropriate solution.
  - ii) Concerns that the practicalities of valet parking could cause delays on the single lane entry/exit to and from the site, leading to traffic backing up on Brockley Hill, especially when a large number of guests arrive in their cars over a short period of time;
  - iii) The proposed 63-84 parking spaces on site for 500 guests with staff and valets is inadequate as demonstrated by the 250+ parking available in the current facility premises. It is evident that this will lead to overflow parking on adjacent residential roads /Brockley Hill resulting in congestion as well as pedestrian/highway safety concerns, impacting local residents.
  - iv) There will be a lack of parking provision, with coaches reducing car park capacity. Not enough evidence to back up parking demand.
  - v) Park & Ride – the applicant has failed to provide evidence as to where overflow parking would be secured. Unclear how off-site car parking could be enforced through legal agreement. Use of Park & Ride is not guaranteed and neither is the use of coaches to transport wedding guests.
  - vi) There have been events in the past operating at full capacity (850 people) where all car parking spaces were fully utilised (280 spaces), and a multistorey car park was used – suggesting parking provision in excess of 1 space per guest.
- 8.12 Regarding concerns of car park capacity, as detailed in Section 4 of my Proof, the layout of the car park has been amended to improve efficiency and increase the number of parking spaces available. This has allowed for both standard car parking and for valet spaces, maximising the number of car parking accommodated on site. With valet parking there would be 124 guest spaces available.
- 8.13 A Car Parking Management Plan for all events will be submitted and agreed with the Council prior to the first event on site. One of the measures is for the employment of an experienced professional valet car parking company at all events. Marshals will direct people to spaces thus reducing search times. If valet spaces are used the transfer of the car from driver to valet parker can easily be managed within the site.
- 8.14 For events for 350 guests or more an Event Management Plan will be submitted and agreed with the Council prior to each event setting out which overspill parking location(s) will be available.

- 8.15 As detailed in Section 6 of my Proof, guests will be asked to book a parking space in advance of an event, with alternative travel options presented to both staff and guests (as detailed in Section 6 of my Proof) to encourage a shift away from the private car. For example, alongside public transport options and travel via coach, a free taxi service will also be provided between the venue and Stanmore underground station.
- 8.16 All these measures will make it highly unlikely that guests will resort to parking on the surrounding streets.
- 8.17 However, as a further measure, I have set out in Section 6 how provision could be secured, ultimately, for parking restrictions to be introduced on Brockley Hill and in nearby residential streets should that be considered necessary.

### **Sustainability and Active Travel Provision**

- 8.18 The key concerns from objectors regarding the impact of the proposals on sustainability and active travel provision, are:
- i) The limited scope to encourage sustainable travel.
  - ii) The proposed maximum capacity is unsustainable and inappropriate for the site and locality, with guests unlikely to arrive in their finery using public transport.
- 8.19 As detailed earlier in my Proof at Section 2, the location of the site does offer travel via sustainable modes including bus services such as the 107, 324 and 142 and connectivity to the London Underground system via Stanmore Station. It is not unrealistic to expect that some guests will use these services, even in formal wear.
- 8.20 As detailed in Section 5 of my proof a detailed Travel Plan will be submitted to the Council for approval prior to the first event taking place. This will include measures such as a free taxi from Stanmore Underground Station.
- 8.21 Improvements to the pedestrian network in the vicinity of the site will also be implemented to encourage those who live within a walking distance of the site to travel on foot.
- 8.22 However, it is still recognised that guests may prefer to travel to the site via private modes and as shown above, the site can accommodate this comfortably.

### **Other Transport Consultants' Technical Notes**

- 8.23 Two local residents' groups in close proximity to the site have instructed transport and highways consultants to review the Transport Assessment submitted as part of the planning application. I have already addressed several of the points raised but for completeness I consider the key points below.

### **Save Our Brockley Hill Neighbourhood Group, RPS**

- 8.24 The Save Our Brockley Hill Neighbourhood Group submitted two letters objecting to the proposals at the site. The main points made in these letters are summarised below.

8.25 The first letter stated:

- i) “[...]The Transport Assessment (TA) work supporting the planning application underestimates likely traffic flow and resultant parking demand associated with the development proposals and therefore rendering the assessment work in valid;
- ii) The TA overestimates the baseline traffic flow associated with the golf centre, which would result in the TA concluding that the proposed development would reduce traffic flow. However, a more accurate assessment would, in fact, result in the proposal increasing traffic flow on the wider road network, to the detriment of highway safety and junction capacity performance; [...]”

8.26 The second letter added the following:

- 8.27 “The applicant suggests that overflow parking could be secured off site but provides no clear evidence of suitable sites and parking availability. This must be agreed at application stage to demonstrate that the strategy is feasible. Without this evidence, there is no guarantee that any off-site car parking can be secured. Furthermore, even if additional off-site car parking was secured, the revised TA makes no reference to how additional coach/shuttle bus provision can be accommodated on site.”
- 8.28 “The TA continues to ignore the issues raised within the Road Safety Audit, which if left unaddressed represents a potential highway safety concern.”

8.29 Save our Brockley Hill Neighbourhood Group also appointed Motion Transport Consultants to review the Transport Assessment submitted as part of the application. Motion produced one report and two technical notes detailing their thoughts on the application. These documents make the following additional points:

- i) Insufficient survey data: traffic flows for the previous use are overestimated and forecasted traffic flows for the proposed use are underestimated;
- ii) Insufficient on-site car parking for both guests and employees, and a lack of information about the on-site car parking management;
- iii) Access proposals are insufficient: in particular, the banned right-turn could still be undertaken and regularly ignored, and u-turning at Pipers Green Lane roundabout creates a highways safety issue
- iv) Accidents have occurred in the vicinity of the proposed site access junction and at the A41 roundabout;
- v) Committed developments have not been included within the traffic flows and traffic modelling scenarios; and,
- vi) Overflow parking proposals are insufficient.



### **Brockley Hill Residents Association, RSK**

8.30 The Brockley Hill Residents Association appointed RSK to review the Transport Assessment submitted as part of the application and the subsequent technical notes submitted by EAS.

8.31 RSK make the following main points:

- i) Insufficient and invalidated survey data for the banqueting facility;
- ii) Insufficient on-site car parking, leading to overspill parking on the surrounding residential streets and the potential for increased collisions;
- iii) Introduction of u-turners at Pipers Green Lane and the A5/Brockley Hill junction may compromise road safety and increase the number of road accidents;
- iv) Blue badge provision is not suitable for a 500-guest banqueting facility;
- v) Staff parking is inadequate given the low PTAL; and,
- vi) Guests crossing Brockley Hill late at night on a road which already experiences accidents.

8.32 I have already addressed the majority of these issues. However, I would make the following additional points:

- i) Travel surveys and traffic estimates for the previous use and forecasted traffic flows for the proposed use have been accepted by LBH. These show a reduction in the likely traffic flow arriving and departing the site. There would not, therefore, be an increased risk of a collision occurring.
- ii) No issues have been raised by LBH and LBB regarding the site access junction. The access junction to the site has been subjected a Stage 1 RSA. It has been agreed that the comments raised in the RSA can be addressed at detailed design stage (a common practice with Stage 1 Road Safety Audits).
- iii) The car parking layout and taxi/coach drop-off facilities, as described in this proof, have been reviewed and amended. Blue badge parking is provided to LBH car parking standards. The layout described in this proof demonstrates that a higher number of vehicles can be accommodated on site than was previously considered. The evidence I have presented shows that all car parking demand for a 500-guest event can be accommodated on site.
- iv) The proposed management of vehicles on the site has been described in my proof. I have explained the onsite how on-site car parking will be managed, how arrangements will be made for coaches and taxis to drop-off and pickup guests, and how provision can be made, if necessary, for overspill car parking. The management strategy includes the use of valet parking and requiring coaches to park off-site.
- v) With regard to highway safety, a pedestrian crossing will be provided at the detailed design stage as part of the site access proposal. As for the risk of u-turns at the Pipers Green Lane roundabout, guests will be provided with information prior to the event ensuring they are

aware they are unable to right turn into the site from the north and advising them to approach from the south, or to U-turn at the Brockley Hill/London Road (Cannons Corner) roundabout. Signage will be located on the highway, outside the site access and at the mini roundabout, advising drivers of this u-turning opportunity . It has been agreed with the Council that this will be considered at the detailed design stage.

- vi) In this proof, I have set out the proposed Travel Plan for the site which will aim to reduce single-occupancy vehicle movements to the site. This is realistic for staff travelling to the site, particularly considering the measures proposed within the Travel Plan, which include a free shuttle/taxi service to and from Stanmore Underground Station and a guaranteed ride home at night for staff.
- vii) Accident data from CrashMap.co.uk was reviewed as part of the submitted planning application (para 3.21 to 3.24). The data has been reviewed again as part of this proof of evidence. The data shows over the last 10 years (2011 to 2021) that only three accidents have occurred at the site access junction. From reviewing the crash reports at least two of these and potentially the third involve vehicles waiting to or turning right into the site. As part of the proposals this manoeuvre will be banned therefore reducing the risk of future accidents of the same nature occurring.
- viii) As for the concern expressed about committed developments being included within the junction modelling assessments, as paragraph 6.14 of the submitted Transport Assessment (CD 68) explains:
  - *“With regard to committed developments, information on this was requested from both LBH and LBB during their respective highways pre-application meetings. Neither Council identified any committed development to include in the modelling.”*

## Section Summary

8.33 In this section I have highlighted the key issues raised by third party objectors, which can be summarised under four main themes: congestion and pollution; highway safety; parking; and sustainability and active travel provision.

8.34 I conclude the following:

- i) The proposal will generate fewer vehicle movements than the previous use of the site, as has been accepted by LBH and LBB. The development will therefore not result in additional congestion and pollution in the local area.
- ii) Improvements have been made to the car parking layout to improve efficiency and safety. Emergency vehicles will be able to access and egress the site without difficulty. Highway safety measures will be implemented on Brockley Hill, including a speed reduction and a prohibition on certain movements. All concerns raised about road safety have been addressed or shown to be capable of being resolved.
- iii) Regarding parking, the car park has been reconfigured to maximise the number of parking spaces and to facilitate a valet system. A professional management company will also be

employed on site to facilitate the smooth operation of parking management by directing cars to the appropriate parking spaces and organising taxi and coach arrivals and departures. Guests will also be asked to book spaces in advance of an event. Alternative modes of transport will also be promoted to both staff and guests in advance of an event and incentives including a free taxi service to promote the uptake of public transport. These measures will be detailed in the Travel Plan and an information sheet provided to guests.

- iv) Provision can be made to introduce parking controls on Brockley Hill, funded by the development, if demonstrated by monitoring to be necessary.
- v) If parking does take place in adjacent residential streets (which I consider highly unlikely) then the local authorities are able to introduce appropriate event day parking control (following appropriate consultation).
- vi) Alternative modes of transport will also be promoted to both staff and guests to encourage the uptake of sustainable travel to the site.

## 9 Summary and Conclusions

- 9.1 The appeal site was in previous use as a golf centre and therefore previously generated trips onto the surrounding highway network. There is no evidence that this caused any issues on the network.
- 9.2 The proposed improvements to the site access will remove the ability to turn right into the site which will be a safety benefit, as will the reduction in speed limit on Brockley Hill to 30MPH.
- 9.3 The proposed access arrangements and speed reduction are agreed with the Council.
- 9.4 Whilst the site is not in a town centre it is accessible by a number of modes of transport. The majority of guests are likely to use taxis, coaches and multi-occupancy cars to access the site. However, a material proportion are also likely to use public transport and in particular the Jubilee Line services to Stanmore. The Jubilee Line gives access through interchange with other lines to extensive areas within London. A free taxi service will be provided between the venue and the station.
- 9.5 A comprehensive Travel Plan will be implemented that will provide information on available modes of transport and encourage use of sustainable modes. One of the key features of travel to venues such as that proposed is the extensive use of car sharing with family and friends in groups of 4 or more commonly travelling in a single car.
- 9.6 A detailed **Car Park Management Plan** will be submitted to the authorities for approval prior to the first event taking place and will be implemented for all events. This will include a range of features, including employment of an experienced event car park management company. Such companies are very experienced at managing events such as large weddings. They will ensure efficient use of the space and will direct guests to the next available car parking space, avoiding the need for inefficient searching. They will also manage coaches and taxis.
- 9.7 For events with 350 guests or more an **Event Management Plan** will be submitted to the Council prior to each event. This document will detail overspill parking facilities that will be available if required. The exact location of overspill parking will be detailed within the Event Management Plan prior to the event.
- 9.8 Coaches and taxis can be accommodated on site with drop off/pick up adjacent to the pedestrian access. Coaches will be managed so that only one arrives on site at a time. However, even if two coaches were on site at any one time this can be accommodated as I have demonstrated in this proof.
- 9.9 I have based my estimates of the likely trip attraction to the venue on data from surveys undertaken at the previous venue. I have demonstrated that for an event with 500 guests all car parking can be accommodated on-site, possibly with the use of valet spaces, which is common for these sorts of events and will be managed by the professional event management company.
- 9.10 Even though the evidence indicates that it is highly unlikely that any event parking will take place on nearby streets, the appellant is willing to monitor any parking associated with the site taking place on Brockley Hill and, if deemed necessary, contribute towards the implementation of parking controls.

- 9.11 Furthermore, if any parking were to take place in nearby residential streets, then the Councils have the ability to introduce event day parking restrictions. Policy T6 of the London Plan supports this approach.
- 9.12 Finally, I have considered the relevant planning policies and how the scheme complies with them.
- 9.13 I turn first to LBH's planning policies:
- 9.14 Below, I set out relevant extracts from LBH Core Strategy (CD 4) and LBH's Development Management Policies document (2013) (CD 3) and explain how the proposal would accord with those policies:
- i) Policy CS1 describes how parking will be managed at new developments to contribute towards modal shift. Although it is accepted that not all guests will choose to use active modes and public transport in their wedding attire, the proposed development layout is designed to allow for pick-up and drop-off services for coaches and taxis to allow for shared travel to the site to reduce single-occupancy vehicle movements to the site. The Travel Plan also contributes to this modal shift by providing for a free shuttle service from the site to Stanmore Underground Station which is a likely journey for a member of staff.
  - ii) Policy DM1 discusses how development proposals must achieve the highest level of design and layout. The proposed development would achieve this in relation to transport. A safe and suitable site access is proposed, and an appropriate level of car parking to meet the likely demand is provided within a pleasant public realm.
  - iii) Policy DM42 sets out the car parking standards for LBH. The proposal would comply with the specific requirements for car/cycle and motorcycle provision in sections A and B of the policy.
  - iv) Further, section E of Policy DM42 states that the design of parking areas should be safe, secure and fit for purpose. The site layout has been maximised and suitable tracking undertaken to show that standard vehicles, emergency vehicles and coaches can access, egress and navigate the parking area without conflict. It is therefore considered safe, secure and fit for purpose.
  - v) Section F of Policy DM 42 states that *"proposals that would result in inappropriate on-site parking provision, [...] those which will create on-street parking problems, prejudice highway safety or diminish the convenience of pedestrian and cyclists, will be resisted"*. I have demonstrated that it is highly unlikely that on-street parking will occur due to the proposed level of car parking proposed on site, the proposed taxi and coach pick-up and drop off facilities, the extensive Travel Plan and the provision of overspill parking facilities nearby if required. However, the appellant is also willing to monitor event parking on Brockley Hill Road and contribute towards the introduction of parking controls if monitoring shows it to be necessary. In addition, if deemed necessary, the Council could introduce parking controls on event days on nearby residential streets.
- Policy DM43 states that *"[...] Transport Assessments should quantify the impacts of the proposals upon [...] the highway network [...]. Mitigation measures will be required to contribute to the desirability of achieving modal shift away from private car use and should*

*include the preparation and implementation of Travel Plans [...]”*. The Transport Assessment assessed the impact of the proposals on the highway network and the results of this assessment are agreed with the Council. A detailed Travel Plan will be submitted and agreed with the Council prior to the first event taking place.

9.15 As for the regional transport policies of the London Plan (CD 2):

- i) The most relevant policy is T6 which deals with car parking provision and controls. The policy states that *“an absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets.”* This indicates that in the highly unlikely event of event parking taking place in surrounding residential streets, the Council is encouraged to implement appropriate controls, and development should not be frustrated by the fact that such controls do not yet exist.
- ii) Policy T4 is concerned with *‘Assessing and mitigating transport impacts’*. A detailed Transport Assessment was submitted with the planning application (CD 68). Highway safety improvements will be implemented on Brockley Hill Road and a Travel Plan will be implemented encouraging use of sustainable modes.

9.16 In the National Planning Policy Framework (NPPF), 2021 (CD 1) paragraph 105 states:

*“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focussed on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”*

9.17 The appeal proposals comply with this policy since:

- i) The proposal would result in fewer local people, their families and friends needing to travel to venues further away to celebrate their marriage;
- ii) A genuine choice of transport modes is available to staff and guests.

9.18 Paragraph 110 of the NPPF states that:

*“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;*

[Comment: The Travel Plan demonstrates that appropriate opportunities to promote sustainable transport have been taken up.]

*b) safe and suitable access to the site can be achieved for all users;*

[Comment: Safe and suitable access can be achieved for all users through the proposed access works and speed reduction on Brockley Hill.]

[...]

*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.*

[Comment: The proposed speed reduction on Brockley Hill Road and the prohibition of certain movements would cost-effectively mitigate the impacts of the development to an acceptable degree. There are no residual highway safety or capacity issues.]

- 9.19 Paragraph 111 of the NPPF states that “*Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*” All safety issues raised have been resolved or shown to be capable of being mitigated. The proposed development will generate less traffic than the previous golf use on the site and it is agreed with the Council that the residual cumulative impacts on the road network would not be severe.
- 9.20 I therefore conclude that the proposed development accords with the relevant transport policies of the development plan. It also accords with the relevant transport policies in the NPPF. Accordingly, there are no transport-related reasons why planning permission should not be granted.

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