

Proof of evidence for Highways and Transport
Harrow Council, London

Prepared by Nicolina Cooper
Interim Head of Traffic, Highways and Asset Management

Appeal by Sairam Holdings against refusal of planning permission at Stanmore &
Edgware Golf Centre, Brockley Hill, Stanmore

Appeal ref: App/M5450/W/22/3299650

LPA Ref: P/3088/20

September 2022

1.0 **Qualifications and Experience**

I am Nicolina Cooper and have been working in Local Government since 1996 in various roles in the transport industry. I have been the named Traffic Manager under the TMA in many roles and have over 20 years of experience in highways, traffic, and parking. I am currently the interim Head of Highways, Traffic and Asset Management for Harrow Council and have been in post since May 2022.

2.0 **Introduction and Scope of Evidence**

2.1 This proof of evidence relates to the highway and transport impacts of the appeal proposals.

2.2 I confirm that the evidence I have prepared for this appeal is true and the opinions expressed in it are my true and professional opinions.

3.0 **Reasons for Refusal**

3.1 Relevant to this proof of evidence, the application was refused for the following reason:

3.2 *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).*

4.0 **Policy**

4.1 Relevant development plan policies are covered in the Planning proof of evidence. In respect of section 111 of the National Planning Policy Framework, this evidence is not given in relation to residual cumulative impact but is focused on highway safety.

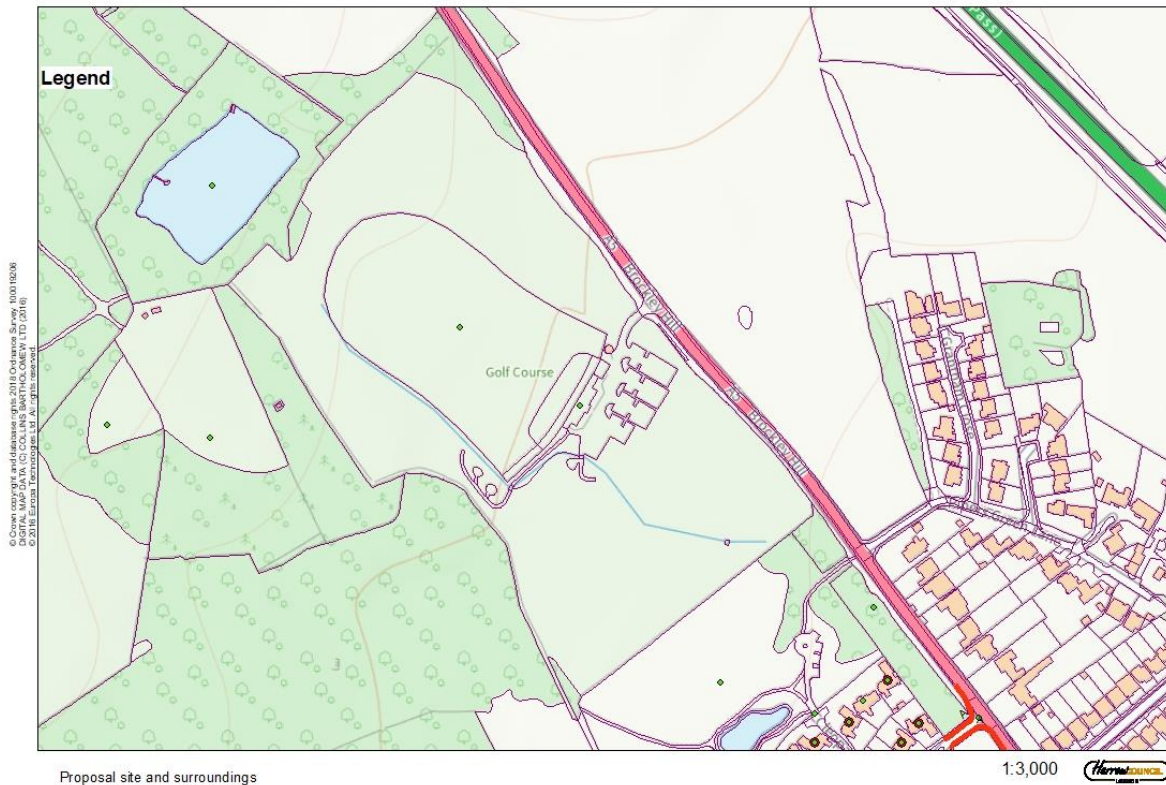
5.0 **The Application**

5.1 **Reasons for refusal**

5.2 The proposal description is recorded as: *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.

5.3 Site and Surroundings



5.4 Stanmore and Edgware Golf Centre is located on Brockley Hill, Stanmore.

5.5 Public Transport Accessibility Level (PTAL) is a measure that rates locations by distance from public transport services from 0 (worst) to 6b (excellent).

5.6 The proposal site has a PTAL rating of 1a which indicates a poor level of public transport facilities meaning that bus, tube and rail are unlikely to be used as a main method of travel for this venue.

5.7 Brockley Hill has semi-rural characteristics with a narrow footway along one side of the carriageway only and is tree lined with open green space to the north but becomes more residential in character to the south where there are houses and wider footways.

5.8 The existing site was formerly a golf centre and car park with approximately 95 spaces (Transport Assessment, item 4.60).

5.9 The proposal seeks to effectively relocate the Premier Banqueting London Ltd venue from its former location in Wealdstone town centre. The proposal

includes a new event venue with on-site parking for 84 vehicles comprising 6 staff spaces and 78 visitor spaces. The proposed maximum capacity is 500 guests.

5.10 **Pre-Application and pre-application process**

5.11 A Highways specific pre-application meeting was held in January 2020 which was attended by LBH officers, EAS consultants and representatives of Premier Banqueting Ltd.

5.12 A full planning application was submitted in September 2020 which was supported by a transport assessment provided by EAS. The decision on this proposal was deferred to allow for submission of further information.

5.13 An updated transport assessment was submitted in April 2021. This attempted to address concerns raised following the initial submission relating to parking coaches off-site, agreement to a speed limit reduction and the intention to address to overspill parking issues with an off-site solution.

5.14 **Traffic generation**

5.15 To determine the likely level of parking demand the site would generate, data from the 2019 events schedule for the Premier Banqueting venue and surveys of two events in January 2020 were undertaken. These surveys asked guests about how they travelled to the venue.

5.16 The surveys showed that for the large (500 person) event, 133 people travelled in 39 cars (3.41 guests/car), 304 by coach, 53 by taxi and 10 by public transport or walking. These figures formed the basis for travel rates for the new proposal.

5.17 Normally I would expect to see data from a number of events to demonstrate average travel rates however, the Covid-19 pandemic restrictions meant that it was not possible to hold events in 2020, furthermore, the TRICS database of trip information did not have appropriate survey data for the type of venue proposed. I have not been provided with more recent and extensive data however, I understand that Premier Banqueting is now closed.

5.18 The lack of appropriate data raises concerns about the reliability of just two events as the basis for determining likely travel activity associated with the proposed development, particularly as the proposal site has poor access to public transport and is in a fairly rural type of setting. It would be difficult to encourage visitors to travel by non-car modes, however, for the purposes of this inquiry, there is no other available trip rate evidence other than that presented by the appellant in the TA and CPMP.

5.19 The table below shows the level of parking at venues offering similar services in Harrow. These all have more parking available in absolute terms and as a proportion of guest capacity than is proposed at the application site.

Location	PTAL	Maximum guest capacity	Parking capacity	Indicative parking ratio
Proposal site	1a	500	78	one space per 6.4 guests
Kadwar Patidar Centre, Kenmore Avenue, Harrow HA3 8LU	1b	700	135 plus additional 65 at a nearby school	one space per 3.5 to 5.1 guests
Byron Hall, Christchurch Avenue, Harrow HA3 5BD	3	1700	422	one space per 4 guests
Dhamecha Lohana Centre, Brember Road, South Harrow HA2 8AX	2	400 (banqueting)	100+	one space per 4.5 guests

5.20 A parking management plan was provided in September 2021 by EAS detailing how parking could be accommodated within the site and off-site for large scale events should the majority of guests attend by car. I comment further on the management plan later in this document.

5.21 A worst case scenario where all guests for a 500 person event arrive by car and taxi was explored and suggested a demand for 131 parking spaces. As the proposal includes 78 on-site guest spaces, 53 additional cars would need to be accommodated. 30 members of staff would be needed for an event of this size and 6 on-site spaces are to be provided as outlined in the Transport Statement .

5.22 There are 26 additional on-site unmarked spaces and 36 potential on-street parking spaces (when existing parking demand is taken into account). (Para 4.21)

5.23 The proposed arrangements to deal with overspill parking include parking within the site in informal, unmarked spaces. As this would require some cars to be double parked, it is intended that a concierge service would manage parking positions. If the amount of cars that arrive exceeded the maximum capacity of the site, it is then proposed that the concierge service could manage the additional cars off-site at the Elstree Manor Hotel located two miles from the proposal site with guests transported between the two sites by electric vehicles.

6.0 Existing parking in surrounding roads

6.1 Brockley Hill

- There are no parking controls in the vicinity of the site.
- There are 'at any time' waiting restrictions for a distance of 65 metres at the junction with Julius Caesar Way.
- The road has a width of approximately 7 metres
- There are footways on both sides of the carriageway to the south of Pipers Green Lane and a footway only on the western side to the north.
- There are eight residential properties, all have extensive off-street parking facilities.
- Traffic is fast flowing with the current speed limit set at 40mph.
- Strategic road – the Council and TfL have a duty to ensure these roads are not unnecessarily obstructed. Parking in this location would cause obstruction and would present an unacceptable safety risk as traffic would be required to overtake.

6.2 Julius Caesar Way

- 'At any time' waiting restrictions at the junction with Brockley Hill for a distance of 34 metres. No other parking controls.
- On entry to the road there are signs stating that this is a private road however the actual classification is unadopted highway.
- Continuing westbound, there is a central planter dividing the road into east and westbound carriageways. The lanes are narrow at approximately 3.5m wide meaning that vehicles would have to mount the footway to park without causing an obstruction to passing vehicles however, this would obstruct the footway for pedestrians and result in safety issues.
- There are six houses in this section, each with off-street parking for at least two cars.
- This leads to a roundabout where Julius Caesar Way has a junction with Cleopatra Close to the north and Flora Close to the south.
- Continuing westbound, the carriageway is of standard construction (no central planters) with a width of 5.00m and 1.5m footways on either side. At this width, it is possible for cars to be parked on one side of the road without causing an obstruction.
- There are 11 houses in this section, each with off-street parking for at least one car.
- On-street parking does seem to occur with cars parked with two wheels on the footway which presents a safety risk for pedestrians however, there is space to park on one side of the carriageway for up to 13 cars.

6.3 Cleopatra Close

- Entry to the road is of standard construction, tarmac carriageway with footways either side.
- After a distance of 11.00 metres, the layout becomes a 4.8 metre wide 'shared surface' consisting of red blocks with no dedicated footway.
- There are eight houses, each with off-street parking for at least two cars.
- The 77 metre road leads to a cul-de-sac end where there is a gated access to parkland.
- Due to vegetation along this road, parking is likely to result in obstruction for vehicles passing. This would not be a suitable location for parking.

6.4 Flora Close

- Entry to the road is of standard construction tarmac carriageway with footways either side.
- After a distance of 19.00 metres, the layout becomes a 4.8 metre wide 'shared surface' consisting of red blocks with no dedicated footway.
- There are 16 houses, each with off-street parking for at least two cars.
- There is space for two vehicles to park without causing obstruction opposite No.2. The width of the rest of the road within the shared surface area would mean that parking in this location would obstruct access to driveways. This would not be a suitable location for parking.

6.5 Claudius Close

- Entry to the road is of standard construction tarmac carriageway with footways either side.
- After a distance of 19.00 metres, the layout becomes a 4.00 metre wide 'shared surface' consisting of red blocks with no dedicated footway.
- There are eight houses, each with off-street parking for at least two cars.
- This road is unsuitable for any on-street parking without causing an obstruction to traffic.

6.6 Augustus Close

- The road is constructed as a 4.80 metre wide 'shared surface.'
- There are 15 houses, each with off-street parking for at least two cars.
- The width of this road would mean parking in this location would obstruct access to driveways. There is however space where two cars could park without causing obstruction beside No. 13 where there are existing signs stating 'short term visitor parking.'

6.7 Fauna Close

- The road is constructed as a 4.8 metre wide carriageway with a 1.5m footway throughout its northern section.
- The eastern section is a 4.8m wide 'shared surface' with no dedicated footway.
- The western section is constructed as a 4.8m wide carriageway with a 1.5m footway for the first 30 metres and the remainder is shared surface with no dedicated footway.
- There are 33 houses, each with off-street parking for at least one car.
- The width of this road would mean parking in this location would obstruct access to driveways. There are single spaces outside No. 26 and opposite No. 16 where cars could park without causing obstruction.

6.8 Brockley Avenue

- The road is of standard construction with tarmac surfacing with footways on both sides on the northern and southern sections. The eastern section has a footway on the east side only. Widths are between 5.0m and 6.6m throughout.
- There are 54 houses, each with off-street parking for at least one car.
- Cars could be parked on this road (up to 52 possible spaces).

6.9 Pipers Green Lane

- The road is a standard construction 4.0m carriageway with tarmac surfacing and footways in part but becomes shared surface to the southern end.
- There are 14 houses, each with off-street parking for at least one car.
- The width of this road would mean parking in this location is likely to limit access for emergency service vehicles. This road is unsuitable for parking on-street.

6.10 Grantham Close

- The road is a standard construction, 5.4m carriageway with tarmac surfacing and footways on either side.
- There are 17 houses, each with off-street parking for at least 2 cars.
- Cars could be parked on this road (up to 10 spaces).

6.11 Newlands Close

- The road is a standard construction, 3.9m carriageway with tarmac surfacing and footways on the northern and eastern sides.
- This road is unsuitable for any on-street parking without causing an obstruction to traffic.

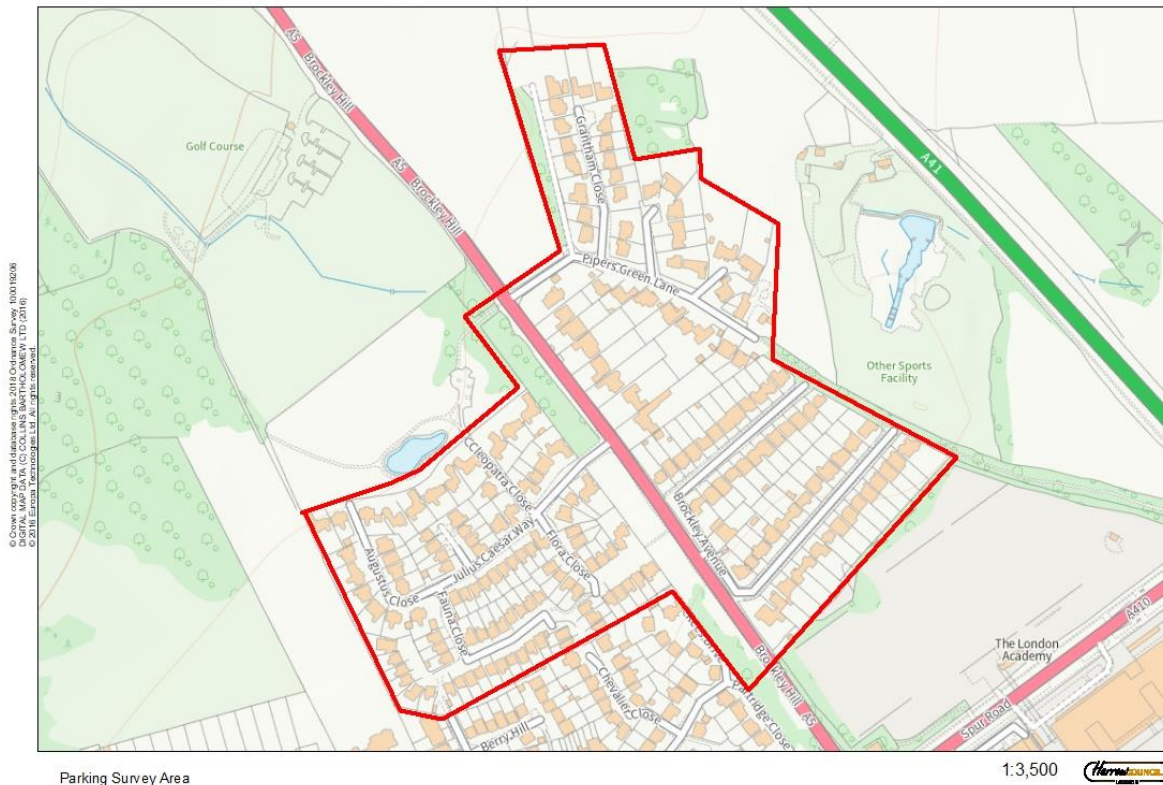
6.12 The total feasible capacity for on-street parking in these residential roads is 81 spaces.

7.0 **Parking Surveys**

7.1 Parking surveys of the residential streets to the south of the site were undertaken by Traffic Data Centre Ltd on Saturday 3rd and Sunday 4th September 2022 as hourly beats between 6pm and midnight based on these being the most likely times that larger events would take place.

7.2 I present the full results of the survey at Appendix A.

7.3 The surveyed roads were Augustus Close, Brockley Avenue, Cleopatra Close, Fauna Close, Flora Close, Grantham Close, Julius Caesar Way, Newlands Close, Pipers Green Lane. Brockley Hill was excluded as the intention is restrict parking in this location for safety reasons.



7.4 The surveys included capacity (number of parking spaces) and parking stress (level of parking occupancy).

Saturday 3 rd September 2022				
Road Names	Capacity	Hour & Occupancy		
		18:00	21:00	23:00
Augustus Close	2	3	3	3
Brockley Avenue	52	20	19	19
Fauna Close	2	2	2	1
Flora Close	2	2	1	1
Grantham Close	10	2	2	2
Julius Caesar Way	13	6	6	6
Total	81	35	33	32

Sunday 4 th September 2022				
Road Names	Capacity	Hour & Occupancy		
		18:00	21:00	23:00
Augustus Close	2	3	3	3
Brockley Avenue	52	25	24	22
Fauna Close	2	3	3	2
Flora Close	2	2	2	1
Grantham Close	10	2	6	5
Julius Caesar Way	13	6	7	6
Total	81	41	45	39

7.5 The outcome shows that the survey area has capacity for 142 cars however, I do not consider all of the roads suitable for parking due to narrow widths.

7.6 Although the full results are included in the attached survey I have extrapolated the results at 6pm, 9pm and 11pm showing occupancy in the roads with feasible parking locations.

8.0 **Consequences of overspill parking**

8.1 When large scale events are held, it is likely that parking demand may exceed the number of available on-site parking spaces which in turn is likely to lead to cars being parked on-street instead.

8.2 Brockley Hill is a busy strategic road, carrying high traffic flows. It would not be desirable for cars to be parked along this road as it may result in

congestion and increase the risk of collisions as overtaking parked vehicles would be required. There are no waiting restrictions on Brockley Hill because there has never been an issue of parking on this road, however, I am concerned that those attending an event at the venue would look to park on Brockley Hill as this would be the nearest place to the venue for unrestricted parking and that would be unsafe. This concern can be addressed if the appellant agrees to contribute towards introducing waiting restrictions which could be secured via a s106 legal agreement.

8.3 Whilst it is possible to resolve concerns relating to Brockley Hill, this does not fully address the possible parking overspill as it is likely that these vehicles would be displaced into the surrounding residential streets to the south of the development site.

8.4 In light of the surrounding parking capacity there are up to 81 on-street parking spaces that could accommodate the possible overspill from the development site however, this may negatively affect residential amenity in relation to people coming and going when leaving and returning to their cars; eg. vehicular noise and talking late at night in a location where this would otherwise be very unusual. However, this is a matter for the planning witness. Based on the worst case scenario set out in the parking management plan, the overspill from the site would require an additional 53 spaces. The site is able to accommodate 26 vehicles in unmarked bays in addition to the 78 guest spaces and the remainder (27 cars) could be parked on-street in the surrounding residential roads to the south of the site.

9.0 **Effectiveness of proposed parking management plan**

9.1 In response to concerns regarding overspill parking, EAS produced a Car Parking Management Plan that sets out proposals for managing events attended by over 350 people.

9.2 The intention is to secure an obligation to implement the measures of the CPMP by s106 agreement however, a draft has not been provided.

9.3 I do not consider the planned arrangements to be enforceable as it will not be possible for the Council to monitor numbers of people attending events.

9.4 I doubt the feasibility of the proposed measures for double parking and off-site parking as these rely wholly on the co-operation of guests – it will not be possible to ensure compliance, however it is accepted that about 26 additional cars can be accommodated within the site in unmarked parking spaces without the need for double parking.

9.5 I doubt the effectiveness of the Elstree Manor Hotel arrangement as this site is an operating hotel with guests that will need to park and is also an events

venue, meaning there is the likelihood that events will be held at the same time in both venues meaning that there isn't the additional capacity available to accommodate the coaches and/or overspill from the Stanmore & Edgware golf centre site.

10.0 **Conclusion**

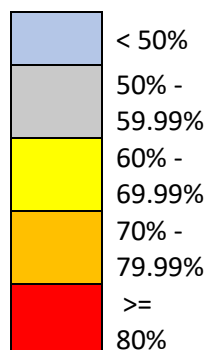
- 10.1 I believe that the proposed site has the potential to generate parking demand levels in excess of the number of allocated parking spaces available within the site.
- 10.2 I believe that the site has additional capacity for parking in unmarked spaces however, overspill is likely to occur when large scale events take place.
- 10.3 I do not believe that the proposed parking management plan is practical or enforceable.
- 10.4 As Brockley Hill is unrestricted, this would be the most likely place that people would choose to park as it is closest to the venue. In my view some people attending the event would park in Brockley Hill that would present an unacceptable risk to Highway safety.
- 10.5 I consider Brockley Hill to be unsafe for parking due to the carriageway width, speed of traffic and the subsequent overtaking that would be required. As a direct result of this proposal, parking will need to be controlled along Brockley Hill to maintain road safety.

22340- Stanmore Parking Capacity Survey

Day & Date **Saturday**
03/09/2022

Time period **18:00 to**
00:00

Weather **Dry**



Stress

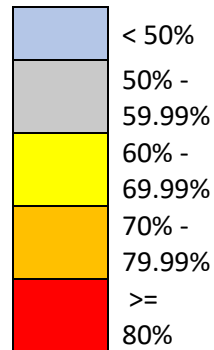
ROAD NAMES	CAPACITY	HOUR & STRESS											
		18:00	STRESS	19:00	STRESS	20:00	STRESS	21:00	STRESS	22:00	STRESS	23:00	STRESS
AUGUSTUS CLOSE	10	3	30%	3	30%	3	30%	3	30%	3	30%	3	30%
BROCKLEY AVENUE	52	25	48%	27	52%	25	48%	24	46%	23	44%	22	42%
CLEOPATRA CLOSE	13	1	8%	1	8%	1	8%	1	8%	1	8%	1	8%
FAUNA CLOSE	12	3	25%	3	25%	3	25%	3	25%	2	17%	2	17%
FLORA CLOSE	7	2	29%	2	29%	2	29%	2	29%	2	29%	1	14%
GRANTHAM CLOSE	10	2	20%	3	30%	3	30%	6	60%	5	50%	5	50%
JULIUS CAESAR WAY	13	6	46%	6	46%	7	54%	7	54%	6	46%	6	46%
NEWLANDS CLOSE	8	2	25%	5	63%	10	125%	9	113%	9	113%	9	113%
PIPERS GREEN LANE	17	2	12%	2	12%	6	35%	11	65%	11	65%	11	65%
TOTAL	142	46	32%	52	37%	60	42%	66	46%	62	44%	60	42%

22340- Stanmore Parking Capacity Survey

Day & Date **Sunday
04/09/2022**

Time period **18:00 to
00:00**

Weather **Dry**



Stress

ROAD NAMES	CAPACITY	HOUR & STRESS											
		18:00	STRESS	19:00	STRESS	20:00	STRESS	21:00	STRESS	22:00	STRESS	23:00	STRESS
AUGUSTUS CLOSE	10	3	30%	3	30%	3	30%	3	30%	3	30%	3	30%
BROCKLEY AVENUE	52	20	38%	20	38%	20	38%	19	37%	19	37%	19	37%
CLEOPATRA CLOSE	13	1	8%	1	8%	1	8%	1	8%	1	8%	1	8%
FAUNA CLOSE	12	2	17%	2	17%	2	17%	2	17%	2	17%	2	17%
FLORA CLOSE	7	2	29%	2	29%	2	29%	1	14%	1	14%	1	14%
GRANTHAM CLOSE	10	2	20%	2	20%	2	20%	2	20%	2	20%	2	20%
JULIUS CAESAR WAY	13	6	46%	6	46%	7	54%	6	46%	6	46%	6	46%
NEWLANDS CLOSE	8	1	13%	1	13%	1	13%	1	13%	1	13%	1	13%
PIPERS GREEN LANE	17	1	6%	0	0%	0	0%	1	6%	0	0%	0	0%
TOTAL	142	38	27%	37	26%	38	27%	36	25%	35	25%	35	25%