

**From:**  
**To:** [Future Merton](#)  
**Cc:**  
**Subject:** Consultation on Main Modifications to Merton's Draft Local Plan  
**Date:** 21 March 2024 17:01:13  
**Attachments:** [Main Modifications Consultation.pdf](#)  
[SLR PTAL report Mar24.pdf](#)

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Dear Future Merton

Please find attached our representations in respect of the above Local Plan consultation.

I would be grateful if you could you formally acknowledge your safe receipt and please do not hesitate to contact us should any queries arise.

Many thanks

Kind Regards

Magenta Planning Ltd  
Company No. 06772118

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LB MERTON'S DRAFT LOCAL PLAN:  
CONSULTATION ON MAIN MODIFICATIONS



ON BEHALF OF TOOTING & MITCHAM SPORTS & LEISURE LTD

MARCH 2024

magenta  
planning

## 1.0 Introduction

- 1.1 This statement is submitted on behalf of our clients, Tooting & Mitcham Sports & Leisure Ltd, in respect of the main modifications which are relevant to Site allocation Mo3 (Imperial Fields at Tooting & Mitcham Hub, Bishopsford Road).

## 2.0 Site Allocation Mo3

- 2.1 We fully support the change to remove the site from Metropolitan Open Land (MOL) for reasons of consistency with our clients' extant planning permission (Ref:- 19/P4094) for residential development, as shown at MM -Open Space Map -03 of the Schedule of Modifications to the Policies Map (LBM36).
- 2.2 We would however wish to record our disappointment that the opportunity for a wider release, to include the area for the future south stand development, has not been taken up at this particular time. Its continued designation as MOL provides an onerous planning policy context for delivering the remaining elements of the masterplan and by limiting the release solely to the MO3 site, it creates an irregular resultant MOL boundary line.
- 2.3 In our view, as advocated and evidenced at the relevant Local Plan hearing session, a far more logical and robust boundary would have been formed by combining the Mo3 release with the adjoining south-stand area, together with the other areas that were proposed for release (ie. at the approved front sports hall and rear changing room block areas), thereby reflecting those areas with extant planning permission and sited on previously developed land.
- 2.4 Notwithstanding, we will be continuing to promote this part of the wider site for a mixed-use development allocation to help complete the final stages of the hub project, as a logical and synergic parcel for development, immediately adjoining the Mo3 housing allocation and urban area generally. We therefore intend to pick up discussions with your Development Management Officers in due course.

### 3.0 Objection to Modification Ref AM131 (PTAL rating)

- 3.1 We note that the PTAL for Mo3 has been changed from PTAL 1 'very poor' to PTAL 2 'poor' access to public transport. The change, whilst being a step in the right direction, does still not factually represent the true value of the site's access to A217 Bishopsford Road and is incorrect. SRL have been commissioned to review this technical matter and their report is attached.
- 3.2 The report concludes (at paragraphs 4.5 & 4.6) that:- *'The base rear scenario is now outdated, although the future year scenarios better reflect the current PTAL, the manual calculation provides a more accurate PTAL using the most recent information supplied by the TfL timetables. It is therefore shown that the Site access demonstrates a **PTAL of 3**'* (Our emphasis in bold). This is illustrated at Figure E on page 8, which shows the resulting PTAL band for the correct Index score of 11.031, providing a PTAL rating of 3.
- 3.3 The report also points out that the PTAL guidance no longer ascribes descriptions to the PTAL ranges so the 'Mo3' summary should not refer to 'poor' accessibility to public transport.

### 4.0 Conclusion & Recommendation

- 4.1 It has been demonstrated by the SLR Technical Note (March 2024) that the correct PTAL rating for the Mo3 site is PTAL 3 (as appropriately calculated at the site access) and not PTAL 2 as currently stated in the Proposed Modifications (ref:- AM131). We therefore respectfully recommend that the PTAL rating reference should be changed to PTAL 3 accordingly.

# Tooting and Mitcham Sports and Leisure Ltd

## Technical Note – PTAL Review

SLR Project No.: 425.065403.00001

18 March 2024

Revision: 01

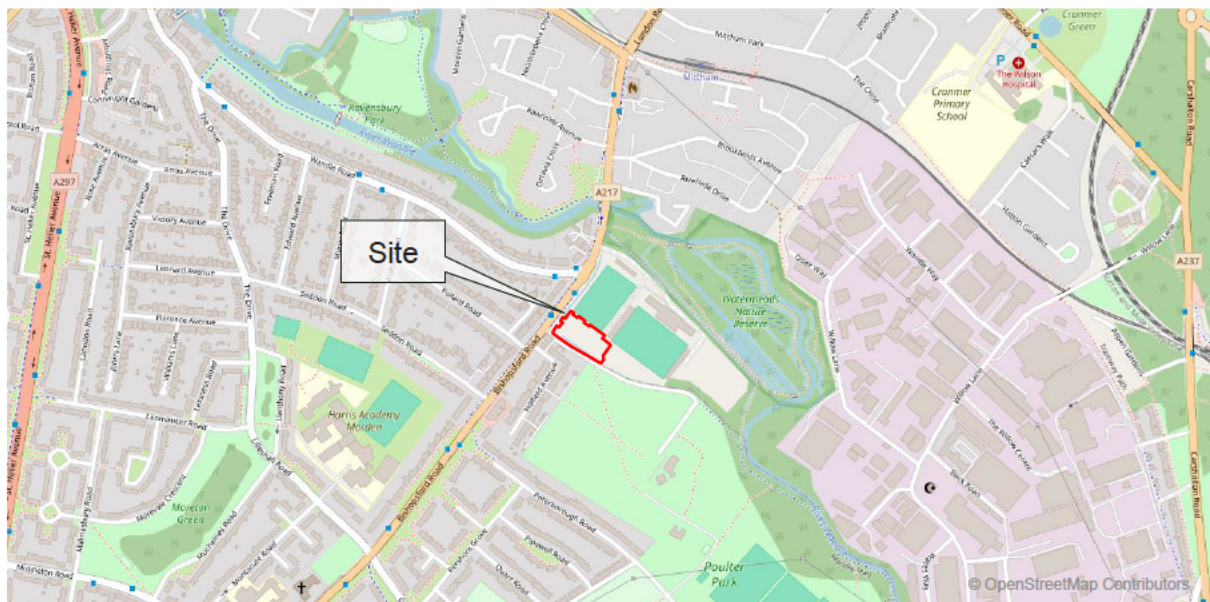
### RE-ASSESSING PTAL RATING

## 1.0 Introduction

### General

- 1.1 Tooting and Mitcham Sports and Leisure Ltd is actively engaged in the London Borough of Merton's Local Plan process (currently at main modifications stage) in respect of their emerging site allocation ref. 'Mo3' as a release from a Metropolitan Open Land.
- 1.2 The site now has the benefit of planning permission (ref. 19/P4094, dated 22/12/2024), together with the Applicant's continued promotion for a wider release on the adjoining land including the future south stand development. Figure A shows the location (details at Appendix A).

**Figure A: Site Location**



## Document Purpose

- 1.3 In 2022, as part of the Local Plan process, the Planning Inspector sought clarification on the Public Transport Accessibility Level (PTAL) for the site's access to A217 Bishopsford Road. Tooting and Mitcham Sports and Leisure Ltd had previously instructed Waterman Infrastructure and Environment Limited ('Waterman') to review the PTAL.
- 1.4 It is noted from the published Proposed Modifications summary for site 'Mo3' that the Site access's PTAL has been increased to a score of 2. This positive change is welcomed, although we note that it does not represent the true value of the site's access to A217 Bishopsford Road.
- 1.5 It should also be noted that the PTAL guidance no longer ascribes descriptions to the PTAL ranges, hence the 'Mo3' summary should not refer to 'poor' accessibility to public transport.
- 1.6 This Technical Note reviews the previously prepared PTAL review in addition to the publicly available PTAL information provided by Transport for London's (TfL) online WebCAT<sup>1</sup> service, including the Base, 2021 and 2031 scenarios. It also provides the results of a manual calculation using the published methodology<sup>2</sup> using current public transport service details.

## Site Access Summary

- 1.7 The site is well connected for a range of transport modes and network. The site has direct access to/from A217 Bishopsford Road, designated a London Distributor Road in LB Merton's road hierarchy. The A217 Bishopsford Road in this location is also part of a designated cycle network, including National Cycle Network Route 20.
- 1.8 A217 Bishopsford Road (including its description as London Road to the north), also accommodates 3 bus services, namely 280, S1 and N44, with Wandle Road to the north hosting routes 118 and N133. Additional services are found further north on A239 Morden Road (route 201).

## Document Structure

- 1.9 Following this Introduction, the Technical Note is structured as follows:
- Section 2 – review of the TfL WebCAT outputs;
  - Section 3 – manual calculation of the PTAL; and
  - Section 4 – Summary and Conclusions.

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<sup>1</sup> <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat> (dated 18/03/2024)

<sup>2</sup> <https://tfl.gov.uk/cdn/static/cms/documents/connectivity-assessment-guide.pdf> (dated 18/03/2024)



## 2.0 TfL WebCAT Review

### General

2.1 The PTAL methodology calculates a score (Public Transport Accessibility Index, *PTA*) for a given location based on set criteria. The Index is assigned to a particular range, denoting the site’s PTAL value. The range thresholds and descriptions are summarised below.

**Figure B: PTAL Thresholds**

PTAL	Access Index range	Map colour
0 (worst)	0	
1a	0.01 – 2.50	
1b	2.51 – 5.0	
2	5.01 – 10.0	
3	10.01 – 15.0	
4	15.01 – 20.0	
5	20.01 – 25.0	
6a	25.01 – 40.0	
6b (best)	40.01+	

2.2 The WebCAT service considers three scenarios: Base; 2021; and 2031. These are based on public transport provision from the original year of 2011 which are then extrapolated to the future horizons using plan-led assumptions.

2.3 As such, it is possible for the online information to be superseded by current, on-the-ground, conditions. TfL acknowledges that inaccuracies occur in the PTAL information<sup>3</sup> stating:

*‘If you feel that a WebCAT-calculated PTAL is not representative of your chosen site (for example, it’s on the boundary of two cells giving different levels), ask for a copy of our PTAL spreadsheet macro and guide by emailing [webcat@tfl.gov.uk](mailto:webcat@tfl.gov.uk). This macro can convert the PTAL calculation text report to a spreadsheet format for you to modify accordingly.’*

2.4 This re-assessment has considered the TfL-provided spreadsheet to re-assess the PTAL rating of the site’s access point. The assessment considers operational criteria including:

- Public transport within reasonable walking distances of the site (640m for buses; 960m for rail, tram, Underground etc.);
- Service frequencies (no. per hour);

<sup>3</sup> <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/planning-with-webcat> (18/03/24)



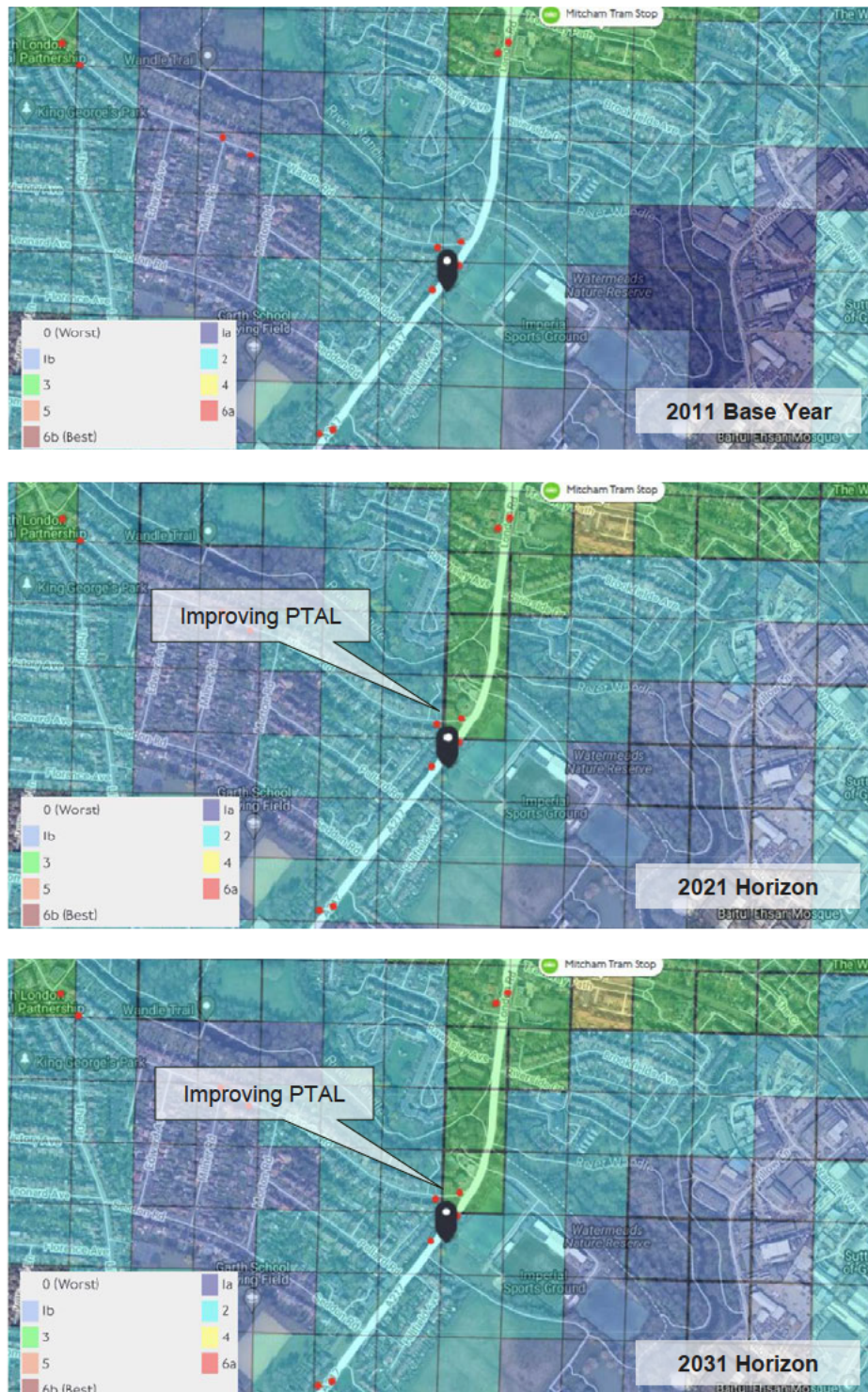


- Passenger waiting times (passengers are assumed to arrive at random, the scheduled waiting time is estimated as half the time interval between arrivals of the service, if a single route has several stops in the area, only the nearest is used).

## WebCAT Outputs

2.5 Figure C shows the current WebCAT outputs changing across each of the 2011 Base Year, 2021 Horizon and 2031 Horizon. All WebCAT outputs are included at Appendix B.

Figure C: WebCAT Outputs – 2011 Base Year, 2021 Horizon & 2031 Horizon



- 2.6 For the 2011 Base Year, the Site access incorrectly records a PTAL of 2. The Index value is recorded as 7.37. This changes slightly for the 2021 Horizon year – the PTAL rating remains incorrectly at 2, however the Index score is shown increasing to 8.28.
- 2.7 The areas that have changed PTAL rating since the Base scenario are shown with a grey border to the map cells - the site is effectively closer to improved public transport access.

### Commentary on Published Index Values

- **2011 Base Year:** The index value (PTAI) is 7.37, comprising 5.30 from bus routes and 2.07 from tram.
- **2021 Horizon:** The PTAI is increased by 3% for bus routes. The index value is 8.28, comprising 5.39 from bus routes and 2.89 from tram.
- **2031 Horizon:** The PTAI is the same as in the 2021 Horizon.

### Outputs and Commentary

- 2.8 Referring to TfL buses and google maps, Mitcham Tram Stop appears misdescribed as Mitcham Tramway Path (bus route 201). Due to the uncertainties within web-based assessments the distances to the bus stops may be inaccurate.
- 2.9 The TfL timetable for Mitcham tram stop does not show a Wimbledon to New Addington route but instead a Beckenham Junction to Wimbledon route. This is further reason to consider a manual calculation.

**Figure D: WebCAT Outputs – 2011 Base Year, 2021 Horizon & 2031 Horizon**

Calculation data										2011 Base Year	
Mode	Stop	Route	Distance (metres)	Frequency (vph)	Walk Time (mins)	SWT (mins)	TAT (mins)	EDF	Weight	AI	
Bus	MITCHAM TRAMWAY PATH	201	601.66	4	7.52	9.5	17.02	1.76	0.5	0.88	
Bus	WANDLE RD BISHOPSFORD RD	118	296.98	5	3.71	8	11.71	2.56	0.5	1.28	
Bus	BISHOPSFORD RD WANDLE RD	280	204.7	6	2.56	7	9.56	3.14	1	3.14	
Tram	Mitcham	Wimbledon-NewAddington'	798.52	8	9.98	4.5	14.48	2.07	1	2.07	
										<b>Total Grid Cell AI: 7.37</b>	

Calculation data										2021 Horizon	
Mode	Stop	Route	Distance (metres)	Frequency (vph)	Walk Time (mins)	SWT (mins)	TAT (mins)	EDF	Weight	AI	
Bus	MITCHAM TRAMWAY PATH	201	601.66	4.14	7.52	9.25	16.77	1.79	0.5	0.89	
Bus	WANDLE RD BISHOPSFORD RD	118	296.98	5.18	3.71	7.8	11.51	2.61	0.5	1.3	
Bus	BISHOPSFORD RD WANDLE RD	280	204.7	6.21	2.56	6.83	9.39	3.2	1	3.2	
Tram	Mitcham	Wimbledon-NewAddington'	798.52	8	9.98	4.5	14.48	2.07	1	2.07	
Tram	Mitcham	Therapia Lane - Elmers End	798.52	4	9.98	8.25	18.23	1.65	0.5	0.82	
										<b>Total Grid Cell AI: 8.28</b>	

Calculation data										2031 Horizon	
Mode	Stop	Route	Distance (metres)	Frequency (vph)	Walk Time (mins)	SWT (mins)	TAT (mins)	EDF	Weight	AI	
Bus	MITCHAM TRAMWAY PATH	201	601.66	4.14	7.52	9.25	16.77	1.79	0.5	0.89	
Bus	WANDLE RD BISHOPSFORD RD	118	296.98	5.18	3.71	7.8	11.51	2.61	0.5	1.3	
Bus	BISHOPSFORD RD WANDLE RD	280	204.7	6.21	2.56	6.83	9.39	3.2	1	3.2	
Tram	Mitcham	'Wimb-NewAd'	798.52	8	9.98	4.5	14.48	2.07	1	2.07	
Tram	Mitcham	'Wimbledon-BEEn'	798.52	4	9.98	8.25	18.23	1.65	0.5	0.82	
										<b>Total Grid Cell AI: 8.28</b>	



## 3.0 Manual PTAL Calculation

### General

- 3.1 SLR has reviewed the previously prepared manual calculation, as well as carrying out a new manual PTAL calculation for the site access on Bishopsford Road (west frontage of the site).

### Criteria

- 3.2 TfL's guidance 'Assessing transport connectivity in London' guide describes the data and steps to find an access index score for a specific location. TfL uses data on the location of all public transport stations and stops in London. They refer to them as service access points (SAPs).

1. *Calculate the walk time to SAPs. Not every bus stop is a separate SAP. If stops are close to each other, TfL code them as a group:*
  - a. *The walk time calculation uses Ordnance Survey's Integrated Transport Network (ITN), which includes all of London's roads. It removes motorways and major trunk roads as they are not suitable for walking. It adds rail bridges, footpaths, and local short cuts.*
  - b. *The calculation assumes people will walk up to 640m (approximately eight minutes) to bus service and up to 960m (twelve minutes) to rail and Tube services. Services available at a longer distance do not affect the PTAL of a selected location. The calculation measures the walk access distance using software such as RouteFinder, an application of the MapInfo package.*
2. *Calculate scheduled waiting time (SWT) for each route at each SAP. The standard PTAL score bases its calculation on service frequencies between 08:15 and 09:15 on a weekday.*
  - a. *The calculation assumes passengers arrive at the station point at random, without adjusting their arrival to the bus timescale, as is common with frequent urban services.*
  - b. *The calculation estimates the SWT (in minutes) as half the time interval between arrivals of the service at the SAP, i.e.,  $SWT = 0.5 * (60/\text{frequency})$ .*
  - c. *If a single route has more than one stops in the area, the calculation only considers the nearest.*
  - d. *If a service runs in both directions, the calculation uses the most frequent direction.*
3. *Calculate average waiting times (AWT) for each route at each SAP. The AWT (in minutes) equals the SWT plus a reliability factor. The reliability factor varies by mode of transport. The reliability factor for buses is two minutes and 0.75 minutes for rail, Tube, or tram services.*
4. *Calculate total access time (TAT) for each route at each SAP. The TAT (in minutes) combines the walk time to the SAP with the AWT at the SAP, i.e.,  $TAT = \text{walk time} + \text{AWT}$ .*



5. Calculate equivalent doorstep frequency (EDF) for each route at each SAP. The EDF (in minutes) converts the TAT back into units of frequency, i.e.,  $EDF = 0.5 * (60/TAT)$ .
6. Calculate Access Index (AI). For each mode of transport available for a certain journey, a specific route from a specific nearby stop or station is the most suitable. The PTAL method bases the AI on summarising the EDFs of all routes at all SAPs (within the acceptable walking distance) but giving a weight of one to the highest EDF per mode and a weight of 0.5 to all other EDFs.

## Calculation

- 3.3 Using google maps, the manual calculation uses a walk distance of 3m for Wandle Road bus stop (route 280), 130m for Bishopsford Road bus stop (route 118). The manual calculation uses Gedge Road bus stop for route 201, a walk distance of 640m.
- 3.4 On the 03/07/2021 the S1 bus route contract was novated from Quality Line and now serves the Green Wrythe Lane bus stop with a walk distance of 450m. The manual calculation also uses the Mitcham tram stop, with a walk distance of 600m.
- 3.5 Using the TfL timetable information Gedge Court bus stop (201) and Green Wrythe Lane bus stop (route S1) have a frequency of four vehicles per hour between 08:15 and 09:15. Bishopsford Road bus stop (route 118) has a frequency between 08:15 and 09:15 of five vehicles per hour.
- 3.6 Wandle Road bus stop (route 280) has a frequency of six vehicles per hour. The Beckenham Junction to Wimbledon tram route has a frequency of six vehicles, and the Elmers End to Wimbledon of seven.
- 3.7 Table A shows the manual calculations for the access, including Green Wrythe Lane bus stop, which now serves the S1 route.

**Table A: Manual PTAL Calculation**

Mode	Stop Name	Route/ Services	Distance (m)	Freq. (vph)	Walk Time (min)	SWT (min)	Reliability	AWT (min)	TAT (min)	EDF	EDF Ranked	EDF Weighting	Index
Bus	Gedge Ct	201	640	4	8.000	7.500	2.000	9.500	17.500	1.714	3	0.5	0.857
	Bishopsford Rd	118	130	5	1.625	6.000	2.000	8.000	9.625	3.117	2	0.5	1.558
	Wandle Rd	280	48	6	0.600	5.000	2.000	7.000	7.600	3.947	1	1	3.947
	Green Wrythe La	S1	450	4	5.625	7.500		7.500	13.125	2.286	15	0.5	1.143
Tram	Mitcham	Beckenham Jn – Wm'dn	600	6	7.500	5.000	0.750	5.750	13.250	2.264	2	0.5	1.132
	Mitcham	Elmers End – Wm'dn	600	7	7.500	4.286	0.750	5.036	12.536	2.393	1	1	2.393
<b>TOTAL</b>												<b>11.031</b>	



3.8 Figure E shows the resulting PTAL band for the correct Index score of 11.031, giving a PTAL rating of 3.

**Figure E: Corrected PTAL Rating**

<b>PTAL</b>	<b>Min</b>	<b>Max</b>	<b>PTAI</b>
0	0	0.01	
1a	0.01	2.5	
1b	2.5	5	
2	5	10	
3	10	15	11.031
4	15	20	
5	20	25	
6a	25	40	
6b	40		



## 4.0 Summary and Conclusion

### Summary

- 4.1 This Technical Note reviews the PTAL of potential site allocation 'Mo3' located at the Tooting and Mitcham Community Sports Club in the London Borough of Merton.
- 4.2 TfL's online WebCAT analysis shows a PTAL rating from the base year (PTAL 2) with the 2021/2031 scenarios recorded an area of PTAL 3 close to the site. However, it is noted that the online service does not always present accurate, on-the-ground, conditions.
- 4.3 A review of the timetable information contained within the TfL website shows increased frequency on the Elmers End to Wimbledon tram route.
- 4.4 A manual PTAL calculation, that includes the current bus routes and tram operational conditions, demonstrates that the site access records a PTAL of 3.

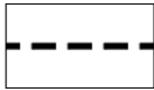


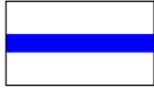


### Conclusion

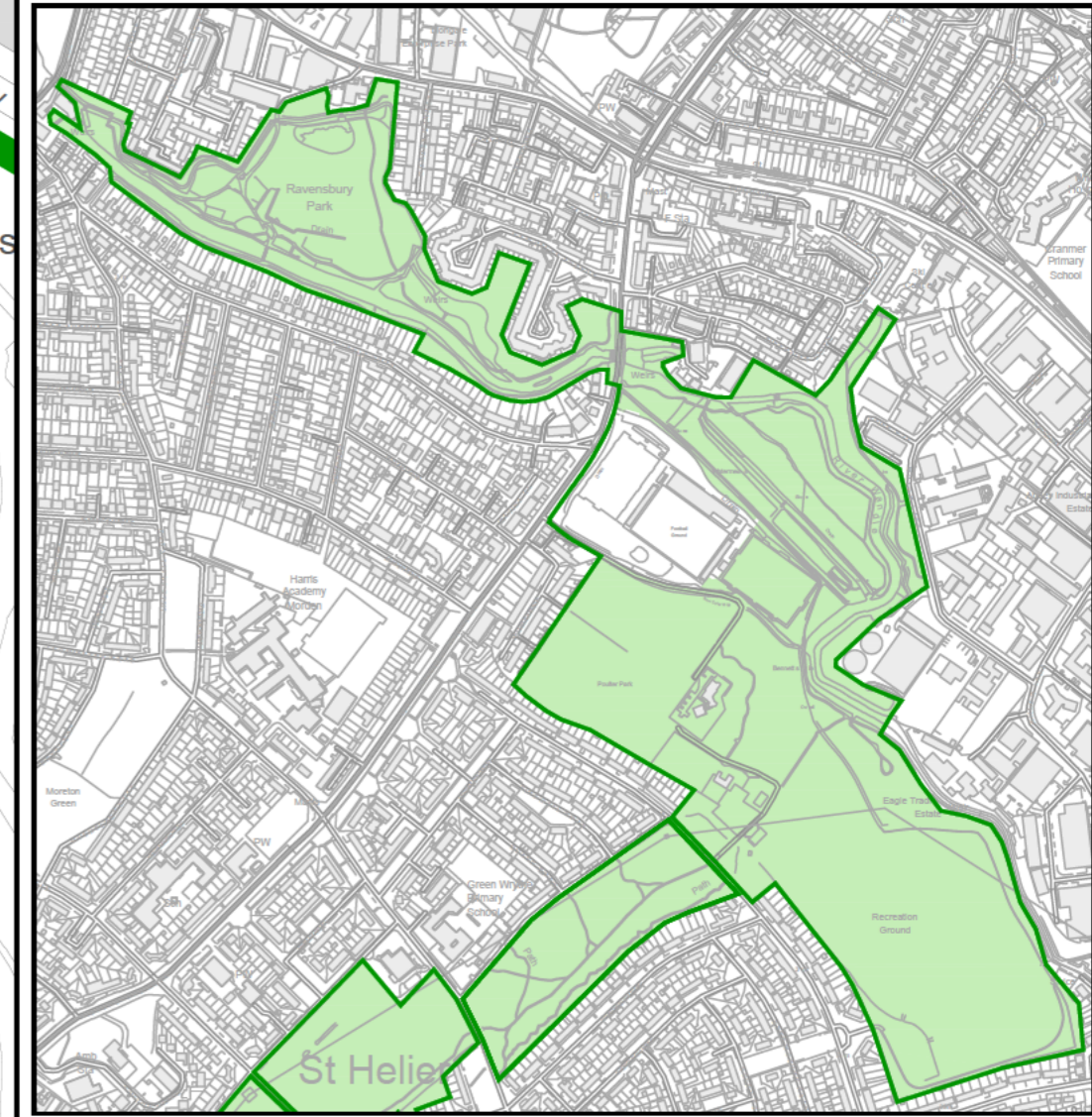
- 4.5 The base year scenario is now outdated, although the future year scenarios better reflect the current PTAL, the manual calculation provides a more accurate PTAL using the most recent information supplied by the TfL timetables.
- 4.6 It is therefore shown that the Site access demonstrates a PTAL of 3.

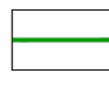
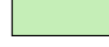


# Appendix A Site Layout



-  Site Boundary  
- 5.54Ha / 13.69Ac
-  Draft Allocation MO3 (to be removed from the MOL)  
- 0.52Ha / 1.28Ac
-  Extent of Existing MOL Boundary
-  Sites with Extant Planning Permission
-  Previously developed land which serves no MOL purpose with potential to be removed from MOL  
- 3.28Ha / 8.11Ac
-  Green Infrastructure and Biodiversity area to remain MOL  
- 1.73Ha / 4.27Ac

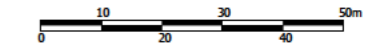


-  Draft Allocation MO3 (to be removed from the MOL)
-  Extent of MOL Boundary after the removal of Previously Developed Land

Project  
**TOOTING & MITCHAM F.C.**


Drawing Title  
**SITE LAYOUT AND DESIGNATIONS**

Date 17.05.22	Scale 1:5000@A2	Drawn by M.D.	Check by L.P.
Project No 34142	Drawing No RG-M-01	Revision -	



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# Appendix B TfL WebCAT Outputs



WebCAT PTAL Report

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Site Details

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Grid Cell: 23796

Easting: 527045

Northing: 167652

Report Date: 21/03/2024

Scenario: Base Year

Calculation Parameters

-----

Day of Week: M-F

Time Period: AM Peak

Walk Speed: 4.8 kph

Bus Node Max Walk Access Time (mins): 8

Bus Reliability Factor: 2.0

LU Station Max Walk Access Time (mins): 12

LU Reliability Factor: 0.75

National Rail Station Max Walk Access Time (mins): 12

National Rail Reliability Factor: 0.75

Mode	Stop	Route	Distance (metres)	Frequency (vph)	Walk Time (mins)			
SWT (mins)		TAT (mins)	EDF	Weight	AI			
Bus	MITCHAM	TRAMWAY PATH	201	601.66	4	7.52	9.5	17.02
1.76	0.5	0.88						
Bus	WANDLE RD	BISHOPSFORD RD		118	296.98	5	3.71	8
11.71	2.56	0.5	1.28					
Bus	BISHOPSFORD RD	WANDLE RD		280	204.7	6	2.56	7
9.56	3.14	1	3.14					
Tram	Mitcham	Wimbledon-New Addington			798.52	8	9.98	4.5
14.48	2.07	1	2.07					

Total Grid Cell AI: 7.37

PTAL: 2

WebCAT PTAL Report

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Site Details

-----

Grid Cell: 23796

Easting: 527045

Northing: 167652

Report Date: 21/03/2024

Scenario: 2021 (Forecast)

Calculation Parameters

-----

Day of Week: M-F

Time Period: AM Peak

Walk Speed: 4.8 kph

Bus Node Max Walk Access Time (mins): 8

Bus Reliability Factor: 2.0

LU Station Max Walk Access Time (mins): 12

LU Reliability Factor: 0.75

National Rail Station Max Walk Access Time (mins): 12

National Rail Reliability Factor: 0.75

Mode	Stop	Route	Distance (metres)	Frequency (vph)	Walk Time (mins)
SWT (mins)		TAT (mins)	EDF	Weight	AI
Bus	MITCHAM	TRAMWAY PATH	201	601.66	4.14
1.79	0.5	0.89			7.52
Bus	WANDLE RD	BISHOPSFORD RD	118	296.98	5.18
11.51	2.61	0.5	1.3		3.71
Bus	BISHOPSFORD RD	WANDLE RD	280	204.7	6.21
9.39	3.2	1	3.2		2.56
Tram	Mitcham	Wimbledon-New Addington		798.52	8
14.48	2.07	1	2.07		9.98
Tram	Mitcham	Therapia Lane - Elmers End		798.52	4
18.23	1.65	0.5	0.82		9.98
					8.25

Total Grid Cell AI: 8.28

PTAL: 2

WebCAT PTAL Report

=====  
Site Details  
-----

Grid Cell: 23796

Easting: 527045  
Northing: 167652

Report Date: 21/03/2024  
Scenario: 2031 (Forecast)

Calculation Parameters  
-----

Day of Week: M-F  
Time Period: AM Peak  
Walk Speed: 4.8 kph  
Bus Node Max Walk Access Time (mins): 8  
Bus Reliability Factor: 2.0  
LU Station Max Walk Access Time (mins): 12  
LU Reliability Factor: 0.75  
National Rail Station Max Walk Access Time (mins): 12  
National Rail Reliability Factor: 0.75

Mode	Stop	Route	Distance (metres)	Frequency (vph)	Walk Time (mins)			
SWT (mins)		TAT (mins)	EDF	Weight	AI			
Bus	MITCHAM	TRAMWAY PATH	201	601.66	4.14	7.52	9.25	16.77
1.79	0.5	0.89						
Bus	WANDLE RD	BISHOPSFORD RD		118	296.98	5.18	3.71	7.8
11.51	2.61	0.5	1.3					
Bus	BISHOPSFORD RD	WANDLE RD		280	204.7	6.21	2.56	6.83
9.39	3.2	1	3.2					
Tram	Mitcham	'Wimb-New Ad		798.52	8	9.98	4.5	14.48
2.07	1	2.07						
Tram	Mitcham	'Wimbledon-ElEn		798.52	4	9.98	8.25	18.23
1.65	0.5	0.82						

Total Grid Cell AI: 8.28  
PTAL: 2

