

MOUNT CLARE CAMPUS, MINSTEAD GARDENS

PROOF OF EVIDENCE OF DAVID GWYN LEWIS MSC MCIHT

PROJECT NO. 25-097 DOC NO. 001

DATE: DECEMBER 2025

VERSION: 2.0

CLIENT: AKA CAPABILITY

Velocity Transport Planning Ltd
www.velocity-tp.com



VELOCITY
Transport Planning

DOCUMENT CONTROL SHEET

Document Reference

Project Title	Mount Clare Campus, Minstead Gardens
Document Title	Proof of Evidence of David Gwyn Lewis MSC MCIHT
Project Number	25-097
Document Number	001
Revision No.	2.0
Document Date	DECEMBER 2025

Document Review

	Name	Date completed
Prepared By	DL	Dec 2025
Reviewed By	DL	
Authorised By	DL	

Notes

The document reference number, revision number and date are given on the footer of each page
© Velocity Transport Planning Ltd
Extracts may be reproduced provided that the source is acknowledged



TABLE OF CONTENTS

1	INTRODUCTION	1
2	APPEAL SITE ACCESSIBILITY	3
3	SUMMARY AND CONCLUSIONS	24

FIGURES

FIGURE 2-1: APPEAL SITE LOCATION	4
FIGURE 2-2: WALKING ISOCHRONE	5
FIGURE 2-3: LOCAL CYCLE ROUTES	7
FIGURE 2-4: CYCLING ISOCHRONE MAP	8
FIGURE 2-5: LOCAL SHOPS	9
FIGURE 2-6: LOCAL SERVICES	10
FIGURE 2-7: LOCAL LEISURE FACILITIES	12
FIGURE 2-8: BUS ROUTING WESTBOUND, MINSTEAD GARDENS STOP, (TFL WEBSITE)	13
FIGURE 2-9: BUS ROUTING EASTBOUND, MINSTEAD GARDENS/DANEbury AVENUE STOP, (TFL WEBSITE)	14
FIGURE 2-10: BUS ROUTES TO BARNES STATION	16
FIGURE 2-11: PTAL MAPPING	18
FIGURE 2-12: WALKING ROUTE TO CLARENCE LANE BUS STOPS	19
FIGURE 2-13: PTAL CALCULATION	19
FIGURE 2-14: PTAL OUTPUT	20
FIGURE 2-15: TIM MAPPING ALL PUBLIC TRANSPORT MODES	21

TABLES

TABLE 2-1: LOCAL SHOPS	9
TABLE 2-2: LOCAL SERVICES	11
TABLE 2-3: LOCAL LEISURE FACILITIES	12
TABLE 2-4: LOCAL BUS FREQUENCY	14
TABLE 2-5: RAILWAY SERVICES FREQUENCY	16
TABLE 2-6: LU SERVICES AND FREQUENCY	17



APPENDICES

APPENDIX A

MANUAL PTAL ANALYSIS



1 INTRODUCTION

1.1 QUALIFICATIONS AND EXPERIENCE

- 1.1.1 I hold a Master's Degree in Transport Planning and Engineering and I am member of the Chartered Institution of Highways and Transportation (CIHT) and a member of the Transport Planning Society (TPS). I have over 18 years' experience in the field of transportation planning and traffic engineering.
- 1.1.2 I have extensive experience of highways and transport planning across the development planning sector and have prepared Transport Assessments, Statements and Studies supporting planning applications across London and the UK.
- 1.1.3 My experience includes periods in the transport development planning teams of WYG (now Tetra Tech), RPS and Motion Consultants Limited. I am currently employed as an Associate Director at Velocity, based in the Central London office.
- 1.1.4 Velocity specialises in advising developers and professionals in the development field on all matters concerning transportation, highways, traffic and road safety and our clients comprise a wide variety of private and public-sector organisations.

1.2 STATEMENT OF TRUTH

- 1.2.1 The evidence which I have prepared and provide 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 opinions.

1.3 SCOPE OF EVIDENCE

- 1.3.1 This Proof of Evidence has been prepared in relation to a Planning Appeal that has been submitted against the non-determination by London Borough of Wandsworth (LBW) of a planning application relating to a proposed change of use of the Mount Clare Campus, Minstead Gardens, Roehampton Gate.
- 1.3.2 A planning application was submitted to LBW in April 2025 (Planning Ref: 2025/0074) for development proposals comprising:
"Use a hostel accommodation (Sui generis with associated landscaping and cycle parking."
- 1.3.3 The current Planning Appeal relates to the non-determination of that application by LBW, although LBW has set out within its Statement of Case, that should the application have been determined, it would have refused planning permission.
- 1.3.4 The Councils Statement of Case lists 7 reasons for refusal. It is highlighted that none of these reasons for refusal directly relate to highways and transport matters. In addition, Paragraph 5.47 of the Councils Statement of Case states that *"the LPA considers that it is unlikely that the proposed development would create a severe impact on the transport network around the site."*
- 1.3.5 Whilst there are no specific transport related reasons for refusal, reason 2 listed within the Councils Statement of Case makes reference to the site having a *"poor level of public accessibility, with limited access to public transport, shops, services and leisure facilities"*



1.3.6 My Proof of Evidence has been prepared in response to this matter within reason for refusal 2 and considers the following:

- Whether the site has a poor level of public accessibility, with limited access to public transport, shops, services and leisure facilities to cater to intended occupiers.

1.3.7 The proposed use of the Appeal Site is to provide temporary accommodation for homeless people and in considering the access to public transport, shops, services and leisure facilities, I have assessed the particular needs of those users. The proposed use of the Appeal Site would not accommodate high dependency residents.

1.3.8 Following this introduction, the remainder of my Proof of Evidence is structured as follows:

- Section 2 provides details of the Appeal Site and surroundings, in particular the opportunities for active and sustainable travel choices, including access to public transport, and details access to shops, services and leisure facilities to cater to future occupiers;
- Section 3 provides the summary and conclusions of my Proof of Evidence.



2 APPEAL SITE ACCESSIBILITY

2.1 INTRODUCTION

- 2.1.1 This section of my Proof of Evidence details the location of the Appeal Site including the highway infrastructure in the local area. This section also details the accessibility of the Appeal Site by all modes of transport, in particular by active and sustainable modes of transport. This section also details the shops, services, facilities and amenities which are accessible in the vicinity of the Appeal Site.
- 2.1.2 The proposed use of the Appeal Site is to provide temporary accommodation for homeless people and in considering the access to public transport, shops, services and leisure facilities, I have assessed the particular needs of those users. The proposed use of the Appeal Site would not accommodate high dependency residents

2.2 SITE BACKGROUND

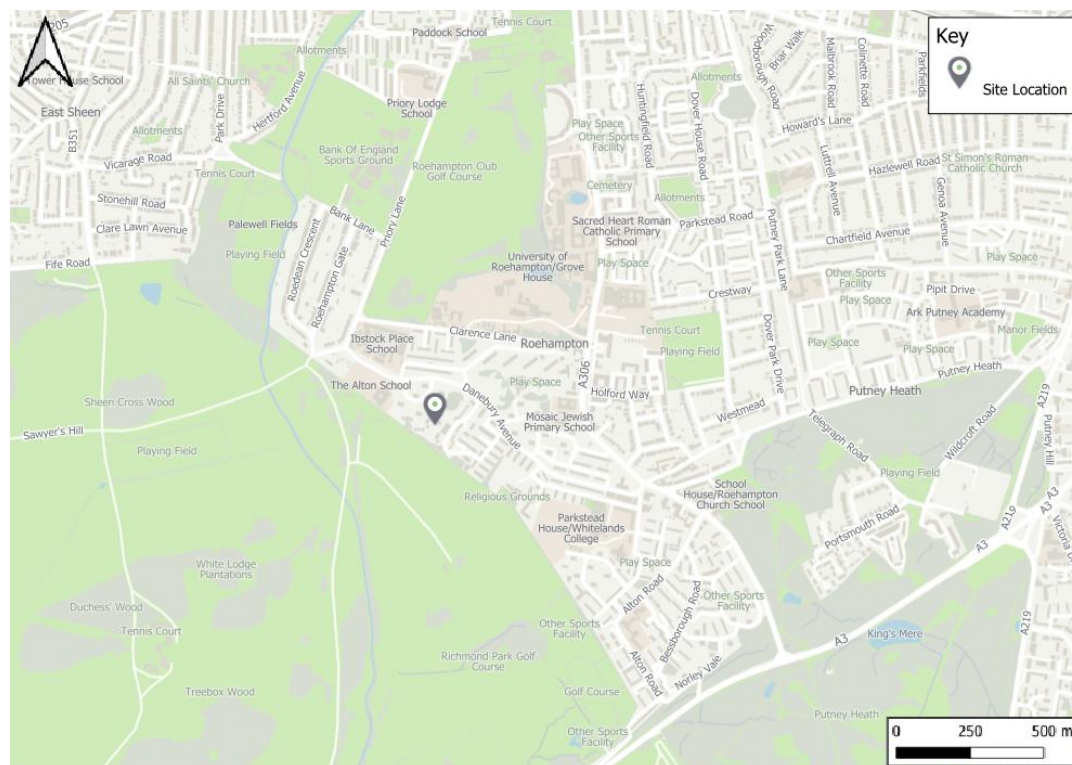
- 2.2.1 The Appeal Site contains Mount Clare House, a Grade I listed 'Palladian' building. To the east is Picasso House, a two-storey 1960s block. To the south lies 'Accommodation Blocks', comprising five clusters of post-war, two-storey blocks, each cluster comprising 3 buildings. Beyond these structures and towards the southern tip of the Appeal Site lies Mount Clare Temple (Grade II* listed), a dilapidated Lodge/bungalow, and other dilapidated outbuildings.

2.3 SITE LOCATION

- 2.3.1 The Appeal Site is situated in Roehampton within the western end of the London Borough of Wandsworth (LBW). The Appeal Site lies just north of Richmond Park Golf Course, and is bound by Minstead Gardens to the east, residential blocks to the west, green spaces immediately north, and vacant residential blocks to the south.
- 2.3.2 The location of the Appeal Site is presented below in **FIGURE 2-1**.



Figure 2-1: Appeal Site Location



- 2.3.3 The area is primarily residential in nature with easy access to green space, community facilities, commercial businesses and transport modes. Danebury Avenue is located to the north of the Appeal Site, runs in a broadly north-west to south-east direction and provides access to local bus services.

2.4 HIGHWAY CONTEXT

- 2.4.1 The Appeal Site is accessible from Minstead Gardens to the east via Danebury Avenue which links north-west towards Priory Lane and south-east to the A306 Roehampton Lane. However, the route between Priory Lane and Danebury Avenue is only accessible to pedestrian and cyclists as there is a modal filter on Danebury Avenue, in the vicinity of Alton Primary School, which restricts vehicle access.
- 2.4.2 Minstead Gardens is a single carriageway road that restricts traffic to one-way movement southbound before circling back to Danebury Avenue via Swanwick Close. Parking is largely unrestricted along this road. It provides access to residential properties to the east of the Appeal Site. Continuous sections of well-maintained footways are present on both sides of Minstead Gardens and dropped kerbs equipped with tactile paving facilitate crossing movements across the road.
- 2.4.3 A turning head is provided at the junction between Minstead Gardens and Danebury Avenue. This is utilised by 170, 430, 639, 670 and N74 bus services who perform turning manoeuvres as they reach the end of their designated route.
- 2.4.4 Danebury Avenue is a single carriageway street subject to a 20mph speed limit. Minstead Gardens and Swanwick Close are also subject to a 20mph speed limit.

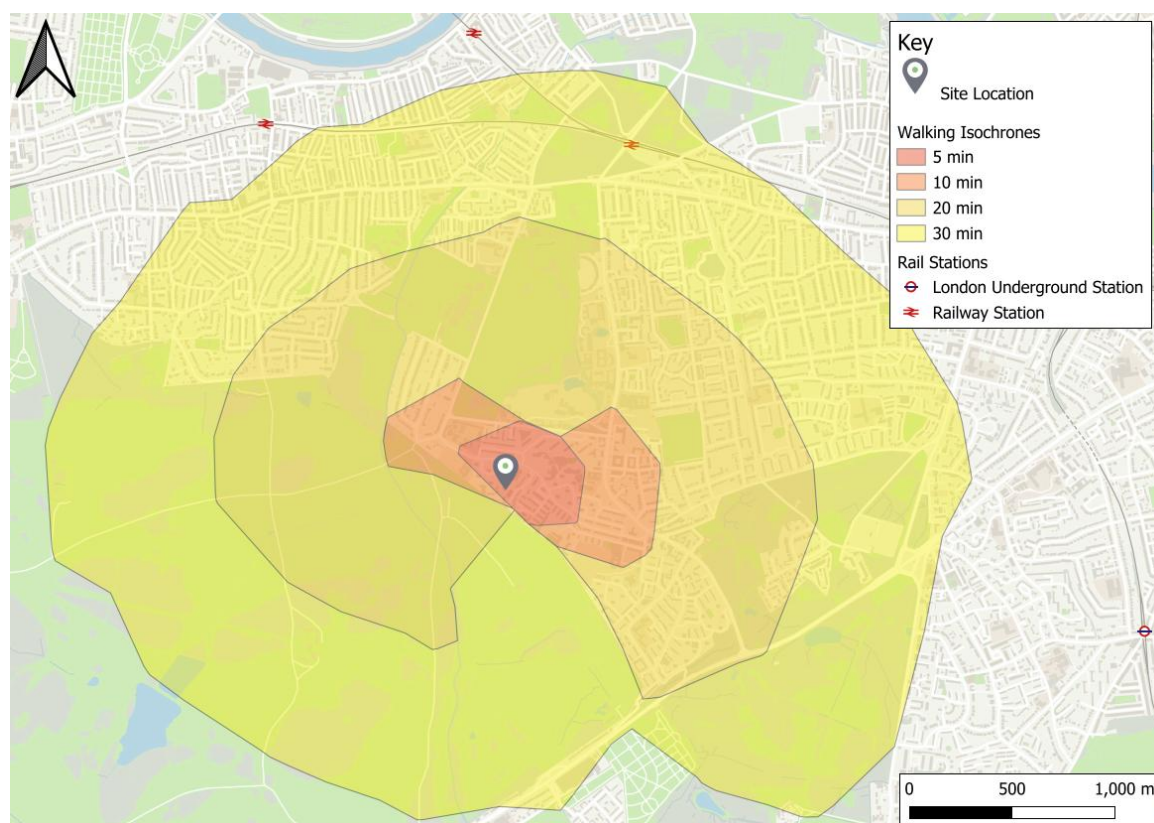


- 2.4.5 Continuous sections of well-maintained footways are present on both sides of the Danebury Avenue facilitating access to the Appeal Site and to nearby public transport services. Furthermore, the presence of green spaces positively contributes to the streetscape creating a pleasant walking environment. Informal crossing facilities, consisting of pedestrian islands and dropped kerbs equipped with tactile paving, are located immediately north of the Appeal Site and facilitate pedestrian crossing movements across Danebury Avenue.

2.5 WALKING AND CYCLING

- 2.5.1 It is generally accepted that for journeys of up to 2km, walking is an appropriate mode to replace car trips which is set out in the Chartered Institution of Highways and Transportation (CIHT) guidance, 'Guidelines for Providing for Journeys on Foot' (2000), which suggests a maximum 'acceptable' walking distance for pedestrians without mobility impairment of 2km. **Figure 2-2** shows the distance that would be expected to be walked within 5, 10, 20 and 30 minutes.

Figure 2-2: Walking Isochrone



- 2.5.2 Overall, the Appeal Site benefits from being well connected to the existing footway network and there are numerous shortcuts and pedestrian only routes that positively promote walking. Pedestrian access is facilitated by continuous sections of well-maintained footway. Dropped kerbs equipped with tactile paving ensure inclusivity and facilitate crossing for pedestrians with visual impairments. Green spaces are easily accessible from the Appeal Site contributing to a pleasant walking environment. Minstead Road is also lined with street lighting ensuring visibility, contributing to perceptions of safety.

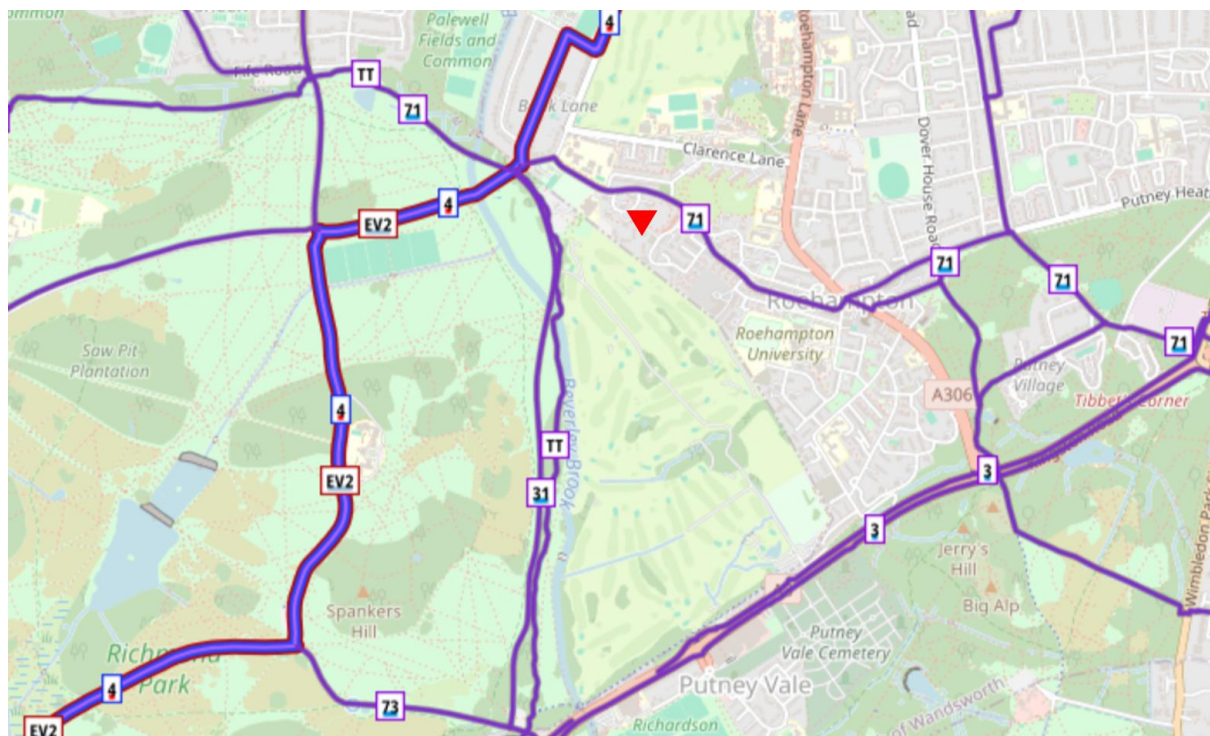
- 2.5.3 The Appeal Site benefits from its close proximity to a range of high-quality green spaces. To the west lies Richmond Park, offering extensive car-free walking routes, cafés and a variety of recreational facilities. Directly south of the Site, Downshire Fields provides pleasant, landscaped walking routes that connect through the estate and link to wider green spaces. To the north, Palewell Playing Fields offers open green space, sports pitches and tennis courts, while to the east, Putney Heath provides further accessible natural areas ideal for walking and outdoor relaxation.

LOCAL CYCLE ROUTES

- 2.5.4 In the nearby vicinity there are a number of cycle routes, London Cycle Network Route 71 is located to the east of the site on Danebury Avenue, within 140m or two-minute cycle from the site and provides a safe route between East Sheen and Wimbledon Park.
- 2.5.5 National Cycle Route 4 is located to the northwest of the site along the Thames Path at Barnes/Putney, approximately 900 m or a six-minute cycle from the site and provides a largely traffic-free riverside route between London and Wales, passing through Putney, Hammersmith, Chiswick, Richmond, Kingston and beyond. Large sections close to the Thames are fully segregated from motor traffic on shared-use paths.
- 2.5.6 The Tamsin Trail is located to the west of the site within Richmond Park, accessible from Roehampton Gate, around 1 km or a five-minute cycle from the site. It forms a 11 km long circular leisure route around the park, offering a traffic-free, segregated off-road loop suitable for recreational cycling. The route links key park destinations and connects further towards Richmond, Kingston and Roehampton.
- 2.5.7 London Cycle Network Route 31 is located west of the site via Roehampton Lane and Roehampton Gate, approximately 900 m or a five-minute cycle from the site. It provides a signed cycle route between Kingston, Roehampton, Richmond Park and Barnes, offering mainly quiet-road sections with some park-adjacent shared-use paths, though not fully segregated.
- 2.5.8 London Cycle Network Route 3 is located east of the site towards Putney and Wandsworth, accessible around 2.1 km or a nine-minute cycle from Minstead Gardens via Roehampton Lane. It provides a signed route linking Richmond Park, Putney, Battersea and central London, made up primarily of quiet residential streets and advisory cycle lanes, with limited segregation.
- 2.5.9 **Figure 2-3** shows the local cycle routes.



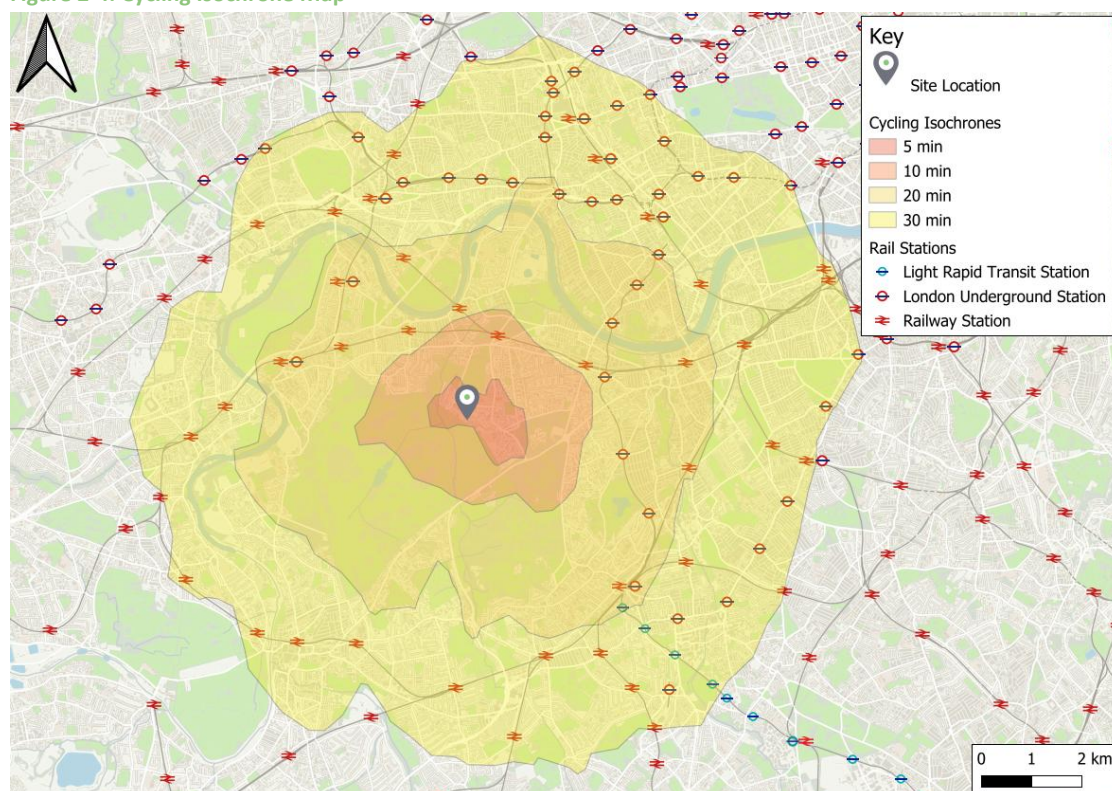
Figure 2-3: Local Cycle Routes



2.5.10

A distance of 5km is generally deemed as the distance from which cycling can effectively replace private car trips. As shown in **Figure 2-4**, the Appeal Site is within a 20-minute cycle to North Sheen, East Putney, Richmond and a 30-minute cycle to Twickenham, Kingston upon Thames, Chiswick, and Wimbledon among other places which provides access to other retail, and commercial uses and public transport services.

Figure 2-4: Cycling Isochrone Map



2.6 ACCESS TO SHOPS, SERVICES AND LEISURE FACILITIES

- 2.6.1 Reason for Refusal 2 listed by LBW asserts that the site has limited access to ‘shops, services and leisure facilities’. This section of my evidence details the shops, services and leisure facilities within the convenient walk and cycle of the site and, as such, demonstrates that the site in fact benefits from excellent access to shops, services and leisure facilities.

ACCESS TO SHOPS

- 2.6.2 Within the local vicinity of the Site, there are numerous shops including convenience stores, supermarkets, restaurants and cafes. These are shown in **Figure 2-5** and listed in **Table 2-1** and considers shops that are appropriate for the needs of the future occupants as they are varied and cover the full range of services that homeless people might require.
- 2.6.3 Along Danebury Avenue (150m or three-minute walk) there is a Londis, Kings General Store and selection of local community shops and facilities. Further along Danebury Avenue (700m or ten-minute walk) there is a Coop supermarket, Subway, Greggs, a café, and a Fish and Chip shop.

Figure 2-5: Local Shops

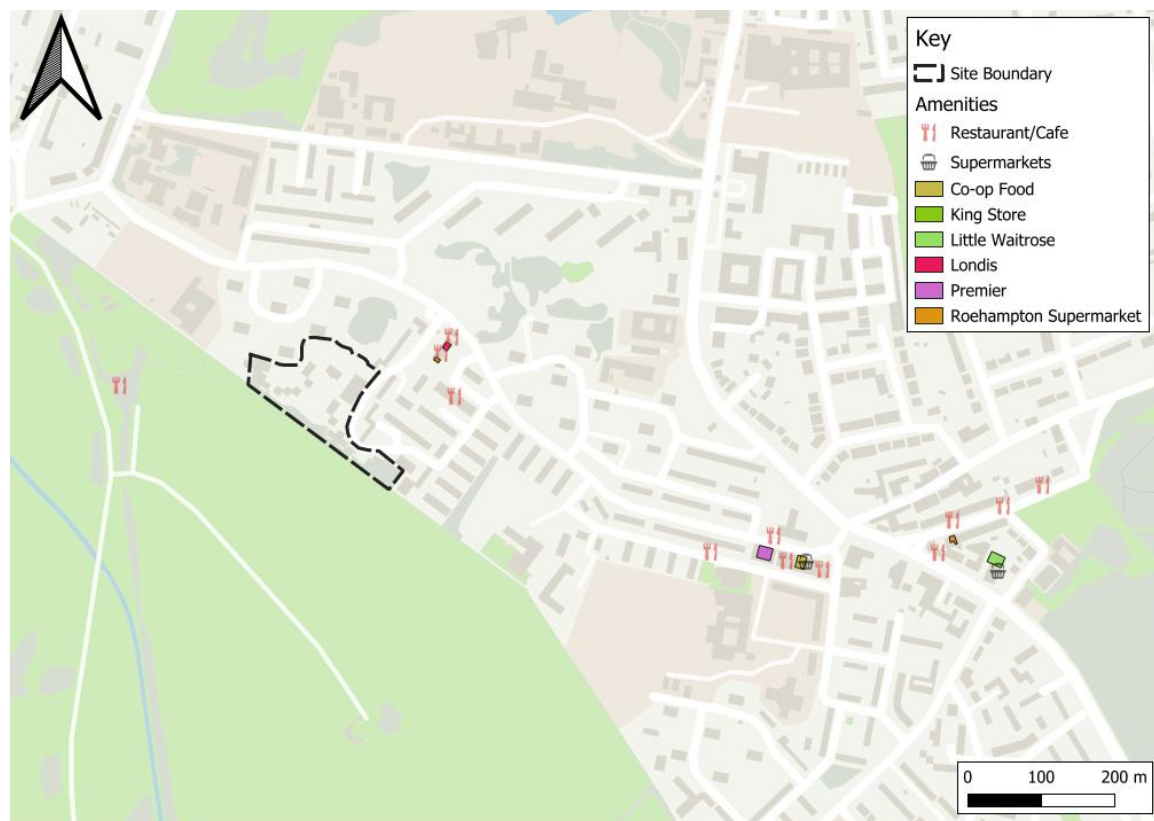


Table 2-1: Local Shops

CATEGORY	DESCRIPTION	DISTANCE FROM SITE
Convenience Store	Kings General Store	120m
Convenience Store	Londis, Portswood Place	150m
Convenience Store	Premier, Danebury Avenue	700m
Supermarket	Co-Operative Food Roehampton	750m
Supermarket	Little Waitrose	1.1km
Supermarket	Roehampton Supermaket	1.1km
Restaurant/food outlet/café	New Tasty House	140m
Restaurant/food outlet/café	Chatka Franka Deli & Coffee Shop	1.1km
Restaurant/food outlet/café	The Right Plaice (Fish and Chips)	680m
Restaurant/food outlet/café	Subway	740m
Restaurant/food outlet/ café	Joy Café	730m
Restaurant/food outlet/café	Greggs	760m

2.6.4

Figure 2-5 and **Table 2-1** demonstrate that there is a wide range of shops within close proximity of the site that would be conveniently accessible on foot and by cycle for future occupants of the site.

ACCESS TO SERVICES

- 2.6.5 Within the local vicinity of the Site, a wide range of community, educational, health and convenience services are available, ensuring that day-to-day needs can be met within a short walk. These facilities are illustrated in **Figure 2-6** and listed in **Table 2-2** and considers services that are appropriate for the needs of the future occupants as they are varied and cover the full range of services that homeless people might require.
- 2.6.6 The surrounding area benefits from a wide range of local facilities located within convenient walking distance of the Site. Essential community services include an ATM (710m), a Post Office (700m) and a nearby laundrette (710m). A number of educational facilities are also available, with The Alton Primary School 320m away, Mosaic Jewish Primary School within 500m, and Ibstock Place Secondary School at 670m.
- 2.6.7 There are a range of health facilities in close proximity of the site, with Danebury Avenue Surgery located just 160m from the Site, followed by Roehampton Surgery, Care Chemist and Focalpoint Opticians all approximately 740m away. Additional medical and dental services including Alton GP Surgery, Maple Dental Care and hospital facilities are all located within 1km.
- 2.6.8 Community amenities such as Roehampton Library (765m) further support local needs, while nearby religious facilities, including Roehampton Methodist Church (80m) and the Kairos Centre (600m), contribute to the social and cultural character of the neighbourhood. Together, these facilities ensure that residents have access to a full range of essential services within a short walking distance of the Site.

Figure 2-6: Local Services

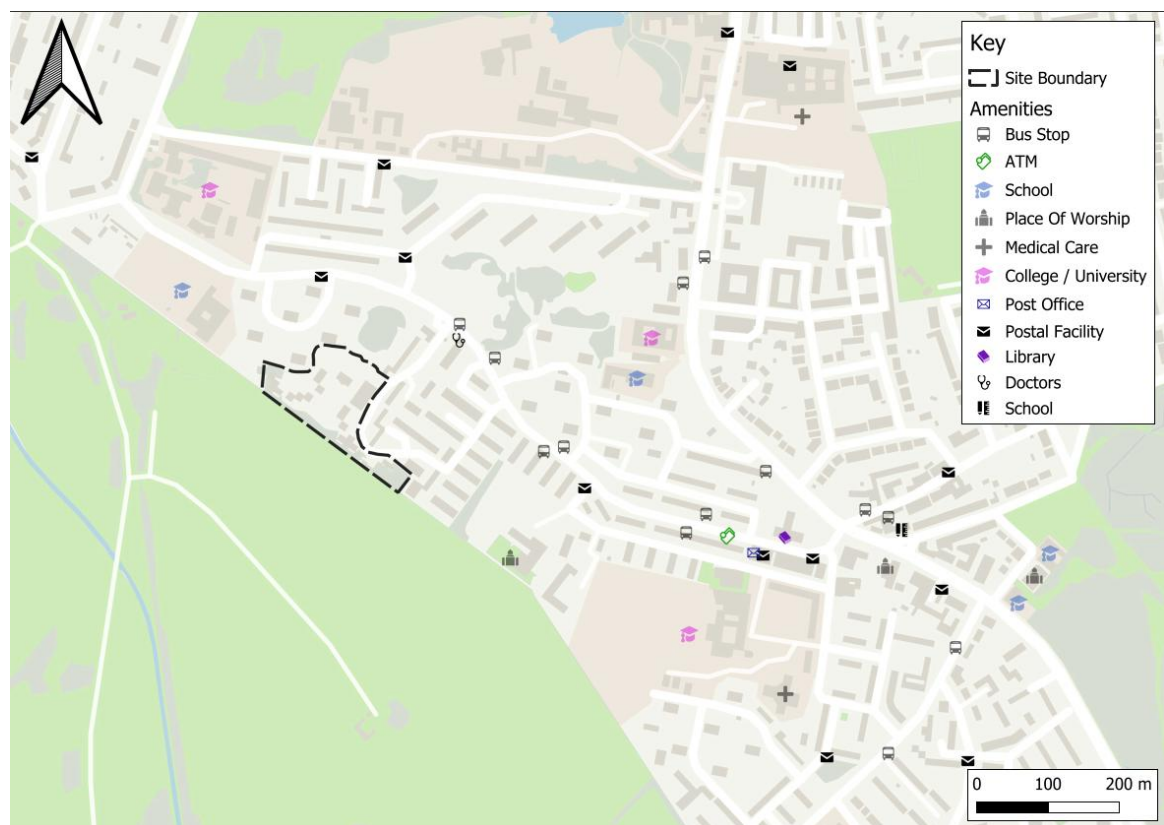


Table 2-2: Local Services

CATEGORY	DESCRIPTION	DISTANCE FROM SITE
ATM	Cashpoint	710m
Service	Post Office	700m
Service	Laundrette	710m
Service	Amir Hairdresser	950m
Service	Ricky's Hair Salon	1.1km
Education	The Alton Primary School	320m
Education	Ibstock Place Secondary school	670m
Education	Mosaic Jewish Primary School	500m
Education	Eastwood Day Nursery & Creche	650m
Health Service	Danbury Avenue Surgery	160m
Health Service	The Roehampton Surgery	740m
Health Service	Care Chemist	740m
Health Service	Focalpoint Opticians	740m
Health Service	Alton GP Surgery	870m
Health Service	Roehampton Dental Care	1km
Health Service	Maple Dental Care	1km
Health Service	Hospital	1km
Public Facility	Roehampton Library	765m
Religious Centre	Roehampton Methodist Church	80m
Religious Centre	Kairos Centre	600m

- 2.6.9 **Figure 2-6** and **Table 2-2** demonstrate that there is a wide range of local services, including a cash point, post office, laundrettes, hairdressers, healthcare and education facilities, as well as libraries and religious facilities all within close proximity of the site that would be conveniently accessible on foot and by cycle for future occupants of the site.

ACCESS TO LEISURE FACILITES

- 2.6.10 Within the local vicinity of the Site, a wide range of leisure and community facilities are available, ensuring that day-to-day needs of residents can be met within a short walk or cycle. These facilities are illustrated in **Figure 2-7** and listed in **Table 2-3** and consider leisure facilities that are appropriate for the needs of the future occupants as they are varied and cover the full range of services that homeless people might require.
- 2.6.11 The Site is well served by a variety of leisure and recreational facilities located within easy walking distance. Nearby open green spaces include Downshire Field, situated just 200m from the Site, providing immediate access to landscaped walking routes, and Maryfield Convent Garden, located 600m away, offering further tranquil outdoor space.
- 2.6.12 Local recreational amenities include a children's playground within 350m, as well as the Roehampton Sport and Leisure Centre at 720m, which provides opportunities for fitness, sport and wellbeing activities.
- 2.6.13 The area is also supported by several community facilities, including the Roehampton Community Hub (130m), Focus Hall Community Centre (140m), Roehampton Hub (500m) and Alton Hall Community Centre (1.3km), each providing a range of programmes, services and community events. Collectively, these facilities create a well-rounded local environment with ample opportunities for recreation, social activities and community engagement.



Figure 2-7: Local Leisure Facilities

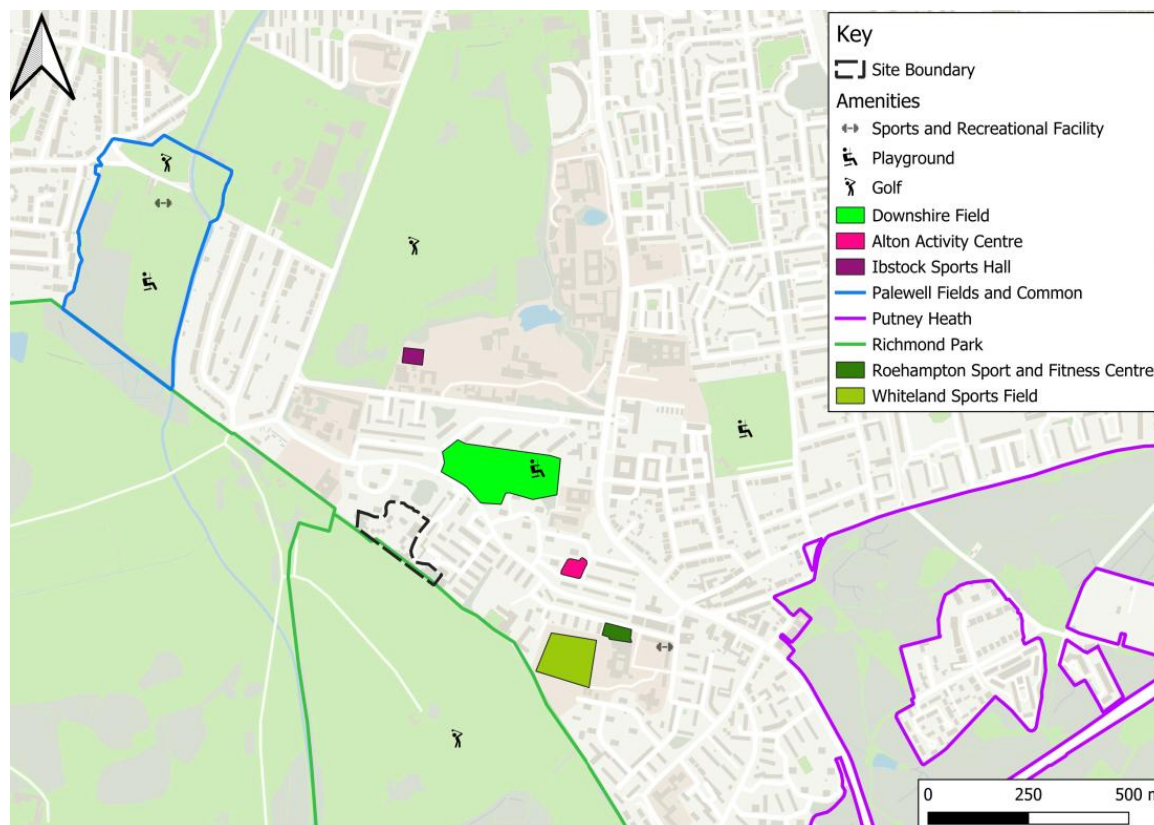


Table 2-3: Local Leisure Facilities

CATEGORY	DESCRIPTION	DISTANCE FROM SITE
Open Green Space	Maryfield Convent Garden	600m
Open Green Space	Downshire Field	200m
Open Green Space	Richmond Park	750m
Open Green Space	Palewell Fields and Common	1.2km
Open Green Space	Putney Heath	1.2km
Open Green Space	Roehampton Recreation Centre	1km
Recreational / Leisure Facility	Children's Playground	350m
Recreational / Leisure Facility	Roehampton Sport and Fitness Centre	720m
Recreational / Leisure Facility	Alton Activity Centre	600m
Recreational / Leisure Facility	Ibstock Sports Hall	500m
Community Facility	Roehampton Community Hub	130m
Community Facility	Focus Hall Community Centre	140m
Community Facility	Roehampton Hub	500m
Community Facility	Alton Hall Community Centre	1.3km

2.6.14

Figure 2-7 and **Table 2-3** demonstrate that there is a wide range of leisure facilities, including open green spaces, recreation and sports facilities and community facilities all within close proximity of the site that would be conveniently accessible on foot and by cycle for future occupants of the site.

2.7 ACCESS TO PUBLIC TRANSPORT

- 2.7.1 Reason for Refusal 2 listed by LBW asserts that the site has '*limited access to public transport*'
- 2.7.2 This section of my evidence details the public transport facilities in close proximity to the site and demonstrates that the site, in fact, benefits from good access to public transport.

PUBLIC TRANSPORT – BUS SERVICES

- 2.7.3 The Appeal Site is located within 140m (representing a three-minute walk) of a bus stop at the junction of Minstead Gardens and Danebury Avenue. Based on TfL website, these provide service for routes 170, 430, 639, 670 and N74. These routes provide access to multiple destinations including Wandsworth, Putney, Roehampton, Battersea, Westminster, Earls Court, Fulham, Wimbledon among others.
- 2.7.4 Minstead Gardens is the last stop for these routes travelling westbound whereas Minstead Gardens/Danebury Avenue is the first stop of these routes travelling eastbound. As shown in **FIGURE 2-8** and **Figure 2-9**, westbound buses use the tuning head at the junction between Minstead Gardens and Danebury Avenue to drop off passengers before circling back onto Danebury Avenue and commencing their return journey. Passengers therefore alight at Minstead Gardens and board at Gardens/Danebury Avenue.

Figure 2-8: Bus Routing Westbound, Minstead Gardens Stop, (TfL Website)

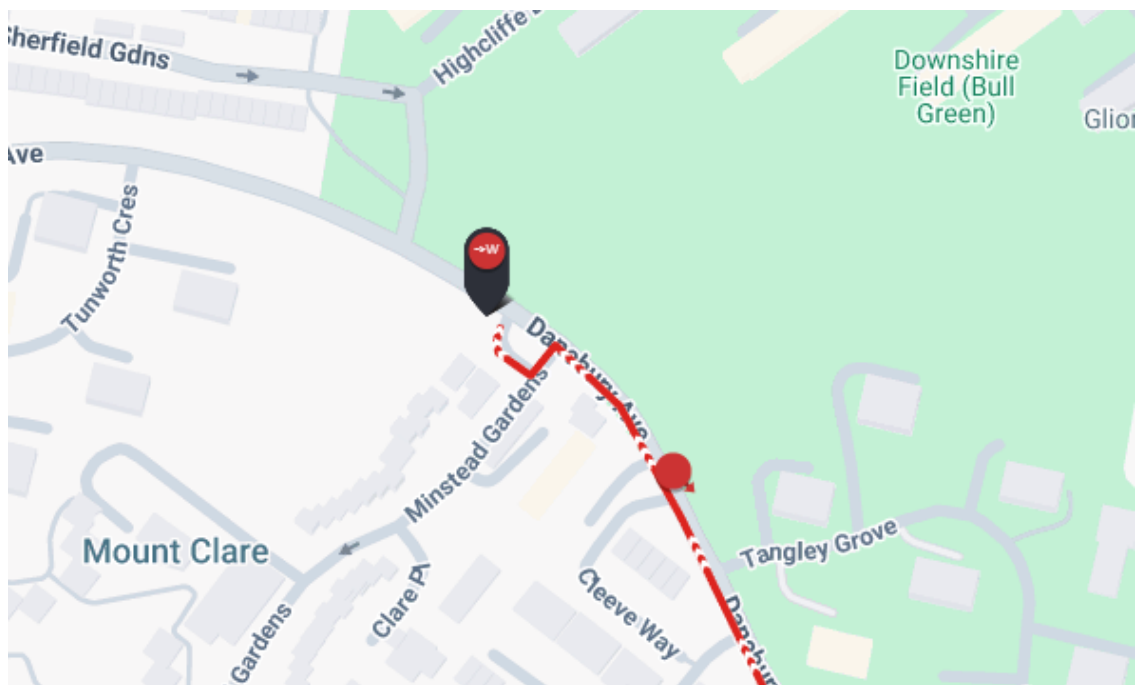


Figure 2-9: Bus Routing Eastbound, Minstead Gardens/Danebury Avenue Stop, (TfL Website)

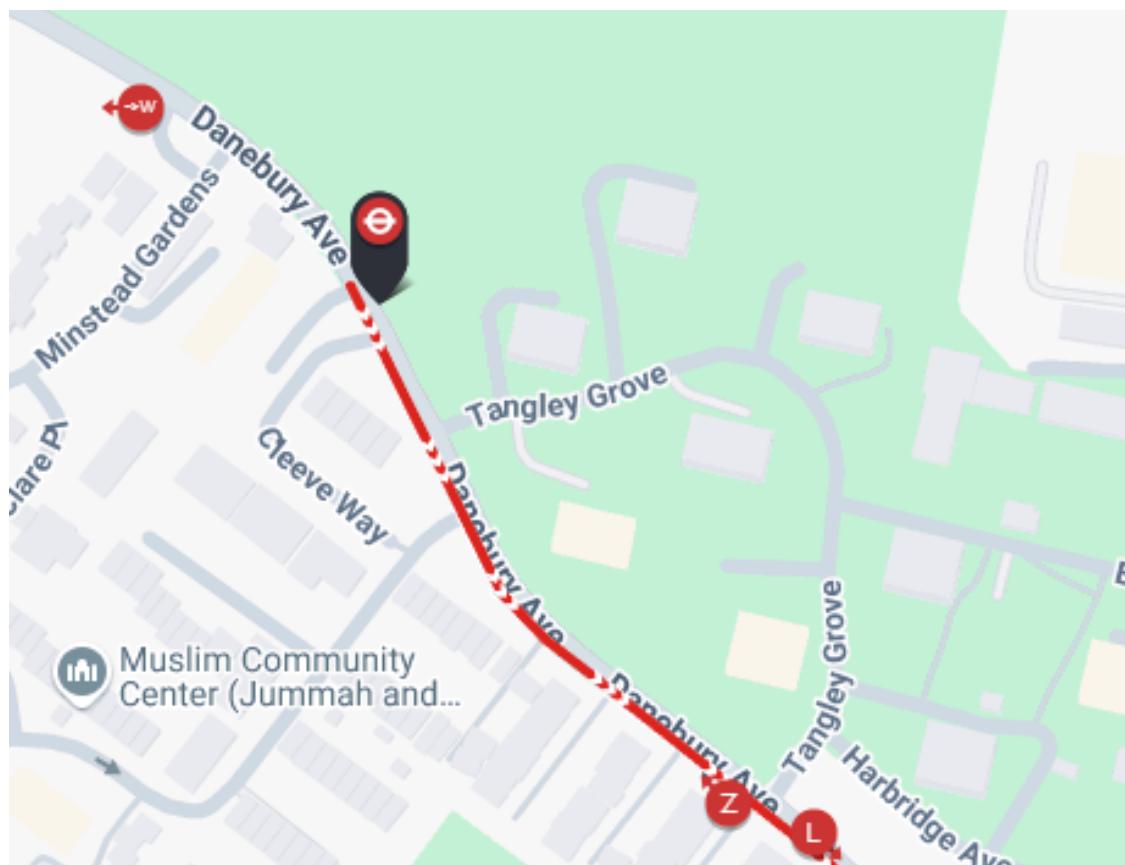


Table 2-4: Local Bus Frequency

Bus Stop	Service No	Route	Weekday		Weekend	
			peak frequency	hours of operation	frequency	hours of operation
Minstead Gardens	170	Victoria - Roehampton	5 per hour	05:09 - 01:31	Sat: 5 per hour Sun: 4 per hour	Sat: 05:09 - 01:31 Sun: 06:09 - 01:31
	430	Brompton - Roehampton	5 per hour	05:49 - 01:31	Sat: 4 per hour Sun: 4 per hour	Sat: 05:48 - 01:33 Sun: 05:48 - 01:31
	639	St John Bosco College - Roehampton	1 per day	16:36	No service	No service
	670	St John Bosco College - Roehampton	1 per day	16:30	No service	No service



Minstead Gardens/Danebury Avenue	N74	Baker Street - Roehampton	9 per day	01:57 - 05:54	Sat: 9 per day Sun: 9 per day	Sat: 02:03 - 05:56 Sun: 01:56 - 05:54
	170	Roehampton - Victoria	5 per hour	05:05 - 00:55	Sat: 5 per hour Sun: 4 per hour	Sat: 05:05 - 00:55 Sun: 06:05 - 00:55
	430	Roehampton - Brompton	5 per hour	05:00 - 00:35	Sat: 4 per hour Sun: 4 per hour	Sat: 05:00 - 00:35 Sun: 05:00 - 00:35
	639	Roehampton - St John Bosco College	1 per day	07:11	No service	No service
	670	Roehampton - St John Bosco College	1 per day	07:11	No service	No service
	N74	Roehampton - Baker Street	8 per day	01:10 - 04:40	Sat: 8 per day Sun: 8 per day	Sat: 01:10 - 04:40 Sun: 01:10 - 04:40

2.7.5 As shown in **Table 2-4**, routes 170 and 430 have regular frequencies of five buses per hour. Routes 639 and 670 are school buses for students attending St John Bosco College, explaining the singular departures in the AM and PM periods.

2.7.6 In addition to the bus stops on Minstead Gardens, further bus stops are situated on Clarence Lane (Stop S and T), north east of the Appeal Site. These stops provide access to additional bus routes 265, 419, 493, 969 and N72. These stops are accessible via public footpaths through Downshire Field and are located 590m and 635m from the Appeal Site for northbound and southbound services respectively.

2.8 PUBLIC TRANSPORT – RAIL SERVICES

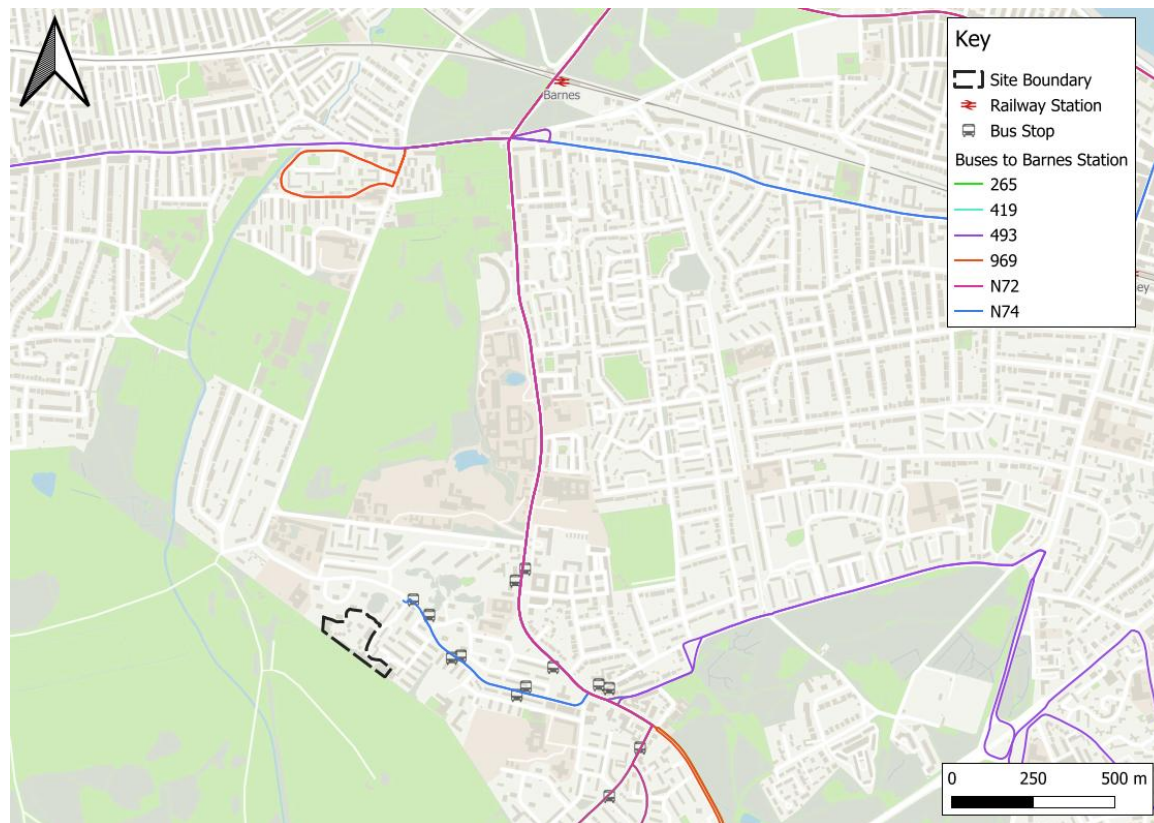
2.8.1 The nearest railway station is Barnes station, located approximately 1.85km northeast of the Appeal Site, representing a 30-minute walk or a 9-minute cycle. The station is also accessible by bus via the 430 bus route which can be accessed from the Minstead Gardens/Danebury Avenue stop.

2.8.2 There are 92 cycle parking spaces within the car park, monitored by CCTV and under shelter to keep bikes safe and away from adverse weather conditions.

2.8.3 **Figure 2-10** shows there are four daytime services to Barnes Station (265, 419, 493, 969) and two nighttime services (N72, N74). Across these services, there are 16 services provided across the peak hours



Figure 2-10: Bus Routes to Barnes Station



2.8.4 Barnes station is served by trains operated by Southwestern Railway and provide access to multiple destinations including London Waterloo, Vauxhall, Clapham Junction, Richmond Junction, Twickenham, Brentford among others.

2.8.5 **Table 2-5** highlights hours of operation and frequency of services from Barnes station

Table 2-5: Railway Services Frequency

Station	Route	Frequency	Hours of operation
Barnes Railway Station	London Waterloo	9 / hour	05:22 - 00:08
	Vauxhall	9 / hour	05:22 - 00:08
	Clapham Junction	9 / hour	05:22 - 00:08
	Richmond (London)	3 / hour	05:15 - 00:22
	Putney	7 / hour	05:22 - 00:08
	Queenstown Road (Battersea)	4 / hour	05:22 - 00:08
	Wandsworth Town	7 / hour	05:22 - 00:08
	Twickenham	4 / hour	05:15 - 00:22
	Brentford	4 / hour	05:42 - 00:12
	Kew Bridge	4 / hour	05:42 - 00:12

2.8.6 Barnes station offers accessible services with step free category of B1 comprising of Level access to Platforms 1 and 4 from separate entrances and lifts to all platforms. The station benefits from 92 fully sheltered cycle parking spaces supporting multi-modal transport options.

2.8.7 Alternatively, Putney railway station is located 2.65km north-east of the Appeal Site and can be reached via the 170 or 430 bus services.

PUBLIC TRANSPORT – LONDON UNDERGROUND SERVICES

- 2.8.8 The nearest London Underground (LU) Station is East Putney, located approximately 2.95km east of the Appeal Site, and can be accessed via the 85, 170 or 430 bus services from Minstead/Danebury Avenue. The station provides district line services providing access to multiple destinations including Wimbledon, Fulham, Edgware Road, Notting Hill, Earls Court among others.
- 2.8.9 East Putney Station is a 15-minute cycle or a 49-minute walk from the Appeal Site. At the station, there are 17 Sheffield Stands providing 34 cycle parking spaces for users.
- 2.8.10 There are three bus routes that provide access to East Putney Underground Station, including the 85, 170 or 430, the journey takes between 32 and 34 minutes depending on the route. Across these routes there are 16 services in the peak hours.
- 2.8.11 **Table 2-5** summarises the hours of operation and frequency of LU services from East Putney station.

Table 2-6: LU Services and frequency

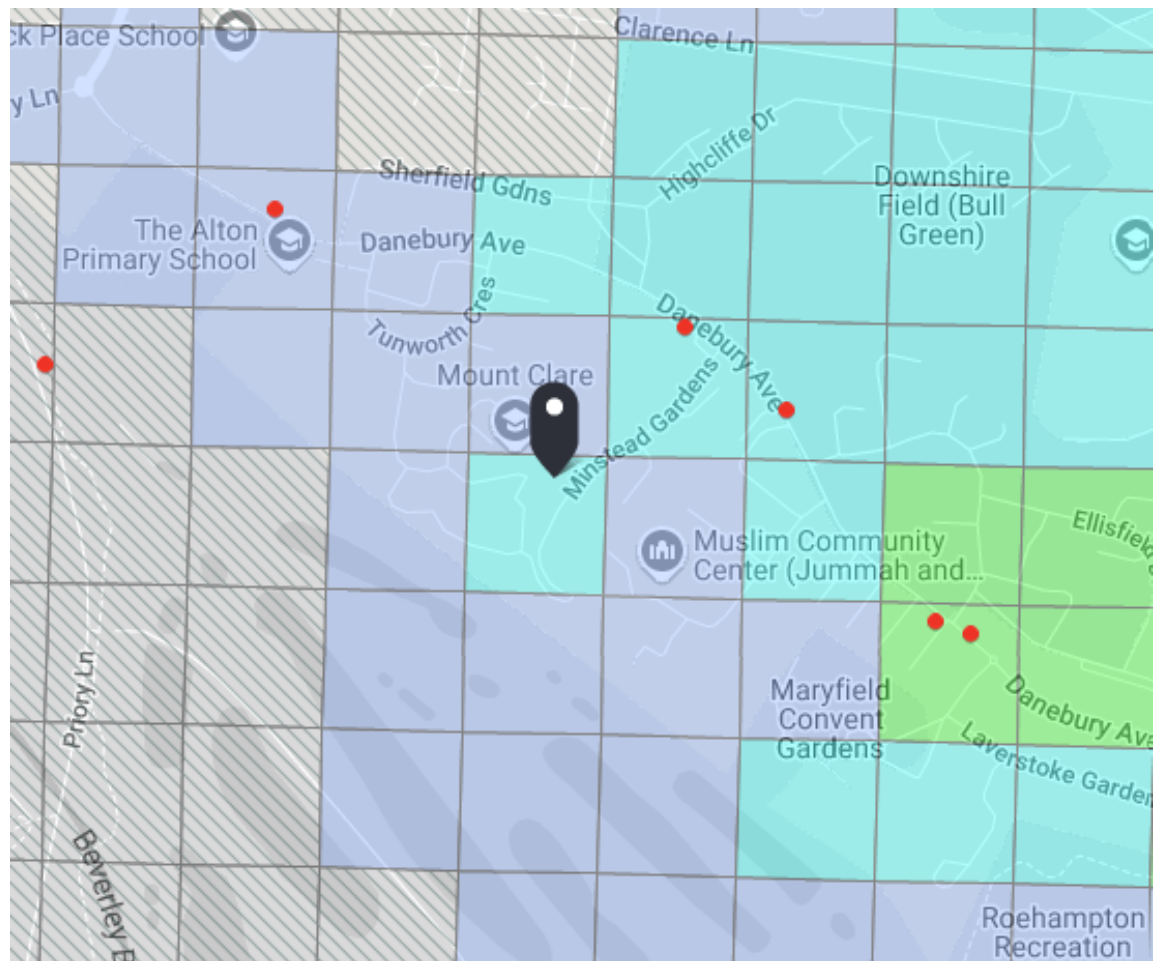
Station	Route	Frequency	Hours of operation
East Putney LU Station	Wimbledon	12 per hour	05:14-1:02
	Edgware Road	6 per hour	05:37-1:00

PUBLIC TRANSPORT ACCESSIBILITY LEVEL (PTAL)

- 2.8.12 Public Transport Access Level (PTAL) is a tool which can be used to assess a site's connectivity to the public transport network to consider the access time and frequency of services. It considers rail stations within a 12-minute walk (960m) of a site and bus stops within an eight-minute walk (640m) and is undertaken using the AM peak hour operating patterns of public transport services.
- 2.8.13 TfL's online WebCAT tool shows the Appeal Site has a PTAL of between 1b and 2 as shown in **Figure 2-11**.

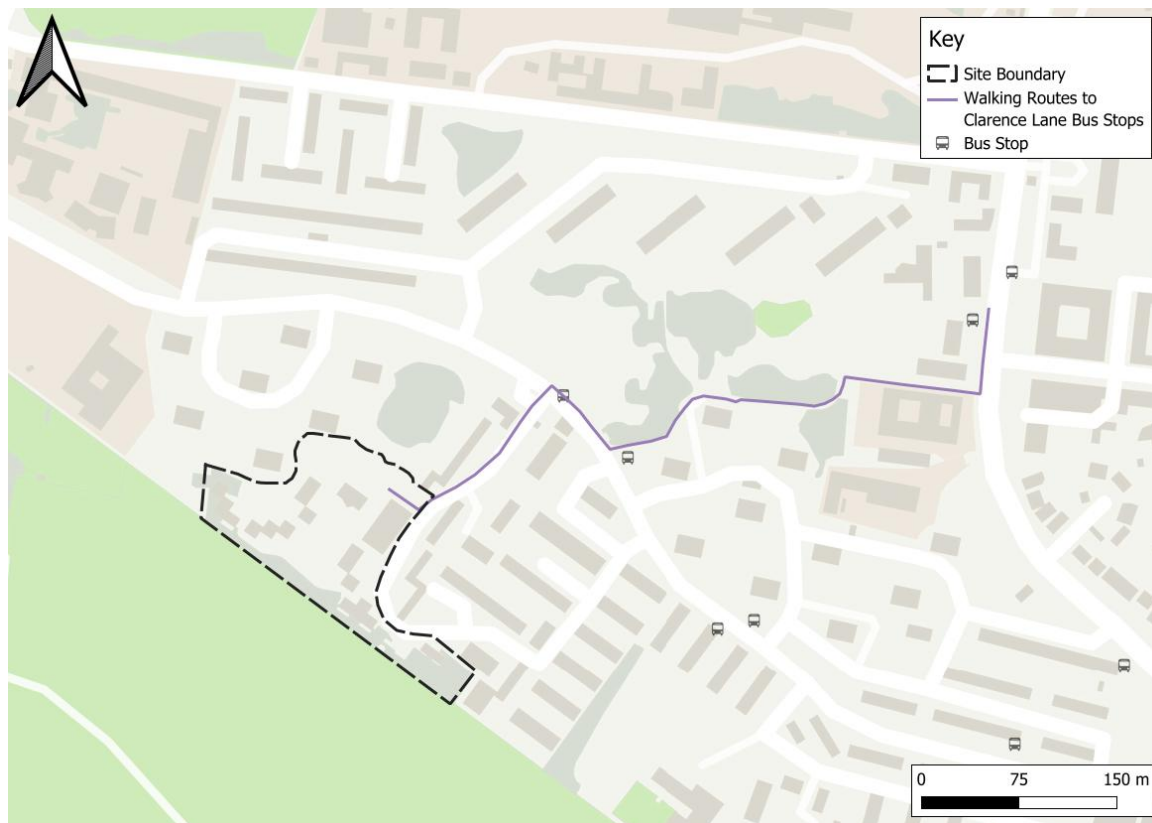


Figure 2-11: PTAL Mapping



- 2.8.14 Despite the PTAL score of the Site, the following sections go on to demonstrate that the PTAL methodology has limitations in assessing the public transport accessibility of a site including not considering all available pedestrian routes and the potential public transport users to interchange between public transport services.
- 2.8.15 A review of the WebCAT output indicates that the automated assessment does not account for all available pedestrian routes surrounding the Site, which results in an underestimation of its actual public transport accessibility of the Site. Notably, the cut-through path linking Danebury Avenue to Roehampton Lane, providing access northwards to the Clarence Lane bus stops within 640m is omitted from the WebCAT analysis. This route is shown in **Figure 2-12**.

Figure 2-12: Walking Route to Clarence Lane Bus Stops



- 2.8.16 Given this additional pedestrian route, a manual PTAL assessment has been undertaken to provide a more detailed assessment of the public transport accessibility of the Site.
- 2.8.17 The manual PTAL assessment is detailed at **Appendix A** and shown in **Figure 2-13** and **Figure 2-14**. The manual assessment demonstrates that, when considering the additional pedestrian route to Clarence Lane, the Site achieves a PTAL of 3, indicating a good level of access to public transport.

Figure 2-13: PTAL Calculation

Mode	Stop	Route	Distance (metres)	Frequency (vph)	Walk Time	Scheduled Waiting Time (SWT)	Reliability	Average Waiting Time (AWT)	Total Access Time (TAT)	Estimated Doorstop Frequency (EDF)
Bus	Danebury Gardens	170	187.6313	6.00	2.35	5.00	2.00	7.00	9.35	3.21
Bus	Danebury Gardens	430	187.6313	6.00	2.35	5.00	2.00	7.00	9.35	3.21
Bus	Clarence Lane (Stop S)	265	564.95	6.00	7.06	5.00	2.00	7.00	14.06	2.13
Bus	Clarence Lane (Stop S)	419	564.95	5.00	7.06	6.00	2.00	8.00	15.06	1.99
Bus	Clarence Lane (Stop S)	493	564.95	5.00	7.06	6.00	2.00	8.00	15.06	1.99
Bus	Clarence Lane (Stop T)	265	611.69	6.00	7.65	5.00	2.00	7.00	14.65	2.05
Bus	Clarence Lane (Stop T)	419	611.69	6.00	7.65	5.00	2.00	7.00	14.65	2.05
Bus	Clarence Lane (Stop T)	493	611.69	5.00	7.65	6.00	2.00	8.00	15.65	1.92



Figure 2-14: PTAL Output

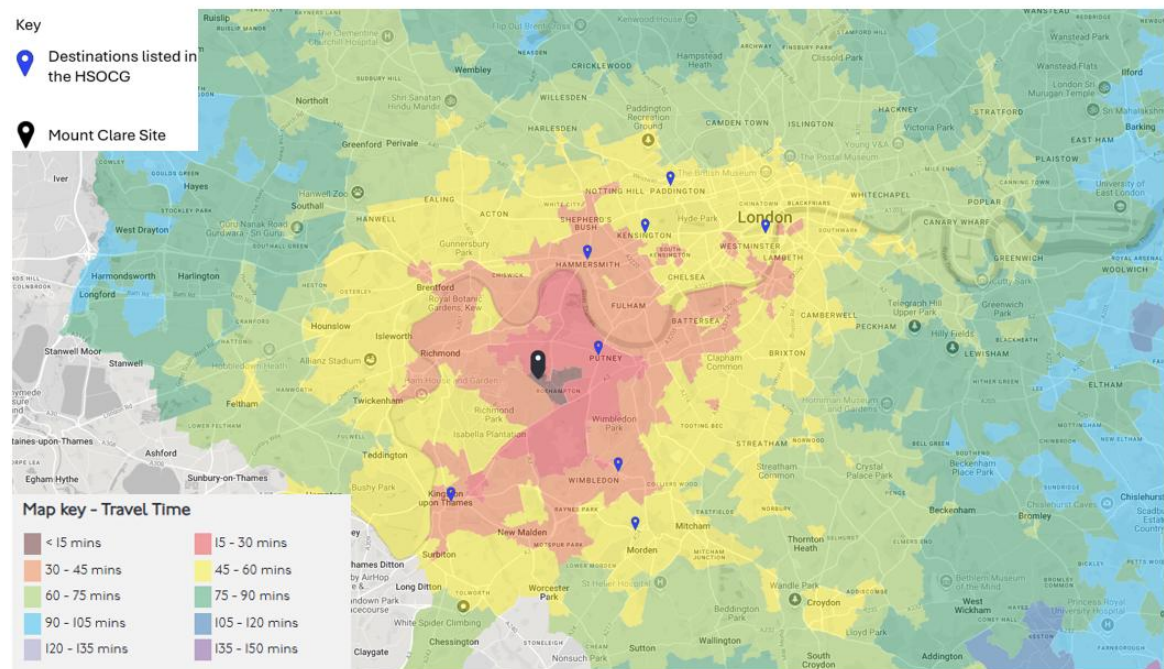
Mode	Max EDF	All other EDFs	Total AI
Bus	3.21	15.34	10.88
Rail	0.00	0.00	0.00
LUL	0.00	0.00	0.00
Total AI			10.88
PTAL			3

TRAVEL TIME MAPPING (TIM)

- 2.8.18 As highlighted above, the PTAL methodology does not consider the potential for public transport users to interchange between public transport services. While the nearest rail and London Underground stations lie beyond the standard PTAL walking thresholds, local bus services provide direct connections to these stations. This enables convenient onward travel across the wider London network. Such interchange opportunities are more accurately captured through additional assessments, including Time Mapping (TIM).
- 2.8.19 Time Mapping analysis (TIM) assesses how far a site user can travel in a given journey time and includes consideration of interchange between public transport services. TIM analysis is provided by TfL and is publicly available on TfL's website through travel time catchments based on a site location.
- 2.8.20 **Figure 2-15** shows an extract of TfL's time mapping (TIM) map for the area surrounding the Appeal Site. This shows that Putney is accessible within a 15 to 30-minute journey. Whereas surrounding areas including Wimbledon, Kingston-upon-Thames and Hammersmith are accessible within a 30 to 45-minutes journey. Furthermore, Paddington, Westminster and Morden are accessible within a 45 to 60-minute journey time.



Figure 2-15: TIM Mapping All Public Transport Modes



2.9 POLICY CONTEXT

2.9.1 LBW Local Plan Policy LP28 relates to Purpose Built Student Accommodation and Paragraph 4 of LP28 states:

"Has access to good levels of public transport, and to shops, services and leisure facilities appropriate to the student population"

2.9.2 Based on the analysis presented in this section of my Evidence, I concluded that the Appeal Site benefits from good level of access to public transport, shops, services and leisure facilities appropriate to the student population and therefore the Appeal site would comply with the requirements of Policy LP28 paragraph 4.

2.9.3 London Plan Policy H16 relates to large-scale purpose built shared living and includes ten criteria listed as A1 to 10. Criteria 3 of Policy H16 states that:

"it is located in an area well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency."

2.9.4 Based on the analysis presented in this section of my Evidence, I concluded that the Appeal Site benefits being well connected to local services and employment opportunities by walking, cycling and public transport and would not contribute to car dependency and therefore would comply with the requirements of Policy H16 criteria 3.

2.9.5 LBW Local Plan Policy LP31 relates to Specialist Housing for Vulnerable People and for Older People and Paragraph 3 of LP31 states:

"The accommodation has access to good levels of public transport, and to shops, services and leisure facilities appropriate to the needs of the intended occupiers"

- 2.9.6 Based on the analysis presented in this section of my Evidence, I concluded that the Appeal Site benefits from good level of access to public transport, shops, services and leisure facilities appropriate for vulnerable and/or older people and therefore the Appeal site would comply with the requirements of Policy LP31 paragraph 3.
- 2.9.7 I understand that there is a dispute about the applicability of these particular policies and I do not comment on that in my evidence, but in any event, I consider that these requirements are met for the reasons set out in my Evidence.
- 2.9.8 London Plan Policy T1 states:
- “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.”*
- 2.9.9 Based on the analysis presented in this section of my Evidence, I concluded that the Appeal Site benefits from appropriate connectivity and accessibility by existing public transport, walking and cycle routes that would accommodate the needs of future site users with impact on the transport network and would there comply with the requirements of London Plan Policy T1.
- 2.9.10 London Plan Policy T2 states
- “Development proposals and Development Plans should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling.”*
- 2.9.11 Based on the analysis presented in this section of my Evidence, I concluded that the Appeal Site benefits from access to public transport, shops, services and leisure facilities in close proximity to the Appeal Site which will facilities future site users making shorter, regular trips by walking and cycling and would there comply with the requirements of London Plan Policy T2.
- 2.9.12 Paragraph 110 of the NPPF states 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”*
- 2.9.13 Whilst I do not consider the proposed change of use to be ‘significant development’ my evidence demonstrates that the location of the Appeal Site will limit the need for future residents to travel and provide them a genuine choice of transport mode, as the Appeal Site benefits from a good level of access to public transport, shops, services and leisure facilities.
- 2.9.14 Paragraph 116 of the NPPF states that:
- “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenario”*
- 2.9.15 This is no evidence that the proposal change of use of the Appeal Site would result in any unacceptable impact on highway safety or severe residual cumulative impact on the road network. As such, there is no reasons why the development should be prevented or refused on highway grounds.



SUMMARY

- 2.9.16 This section of my evidence demonstrates that the Appeal Site benefits from access to local public transport services including buses, rail and London Underground services.
- 2.9.17 My evidence demonstrates that the PTAL WebCAT website likely underestimate the PTAL rating of the Appeal Site. When considering additional pedestrian routes which provide access to bus stops on Clarence Lane, the Appeal Site achieves a PTAL of 3.
- 2.9.18 My evidence demonstrates that the PTAL methodology does not consider the potential for public transport users to interchange between public transport services, which they will realistically do. Using TfL's TIM mapping to assess the public transport accessibility of the Appeal Site accessible demonstrates that there is a wide range of destinations accessible within a convenient public transport journey time of the Appeal Site.



3 SUMMARY AND CONCLUSIONS

- 3.1.1 This Proof of Evidence has been prepared in relation to a Planning Appeal that has been submitted against the non-determination by London Borough of Wandsworth (LBW) of a planning application relating to a proposed change of use of the Mount Clare Campus, Minstead Gardens, Roehampton Gate.
- 3.1.2 A planning application was submitted to LBW in April 2025 (Planning Ref: 2025/0074) for development proposals comprising:
- “Use a hostel accommodation (Sui generis with associated landscaping and cycle parking.”*
- 3.1.3 The current Planning Appeal relates to the non-determination of that application by LBW, although LBW has set out within its Statement of Case, that should the application have been determined, it would have refused planning permission.
- 3.1.4 The Councils Statement of Case lists 7 reasons for refusal. It is highlighted that none of these reasons for refusal directly relate to highways and transport matters. In addition, Paragraph 5.47 of the Councils Statement of Case states that *“the LPA considers that it is unlikely that the proposed development would create a severe impact on the transport network around the site.”*
- 3.1.5 Whilst there are no specific transport related reasons for refusal, reason 2 listed within the Councils Statement of Case makes reference to the site having a *“poor level of public accessibility, with limited access to public transport, shops, services and leisure facilities”*
- 3.1.6 My Proof of Evidence has been prepared in response to this matter within reason for refusal 2 and considers the following:
- Whether the site has a poor level of public accessibility, with limited access to public transport, shops, services and leisure facilities to cater to intended occupiers.

3.2 ACCESS TO SHOPS

- 3.2.1 My evidence demonstrates that the Appeal Site is within close proximity of a wide range of shops and these would be conveniently accessible on foot and by cycle for future occupants of the site.

3.3 ACCESS TO SERVICES

- 3.3.1 My evidence demonstrates that the Appeal Site is within close proximity to a wide range of local services, including a cash point, post office, laundrettes, hairdressers, healthcare and education facilities, as well as libraries and religious facilities and these would be conveniently accessible on foot and by cycle for future occupants of the site.

3.4 ACCESS TO LEISURES FACILITIES

- 3.4.1 My evidence demonstrates that the Appeal Site is within close proximity to a wide range of leisure facilities, including open green spaces, recreation and sports facilities and community facilities that would be conveniently accessible on foot and by cycle for future occupants of the site.



3.5 ACCESS TO PUBLIC TRANSPORT

- 3.5.1 This section of my evidence demonstrates that the Appeal Site benefits from access to local public transport services including buses, rail and London Underground services. A manual PTAL assessment demonstrates that the Appeal Site achieves a PTAL of 3 and TfL's TIM mapping demonstrates that there is a wide range of destinations accessible within a convenient public transport journey time of the Appeal Site.

3.6 SUMMARY

- 3.6.1 In summary, my evidence demonstrates that:
- the Appeal Site benefits from excellent access to local shops, services and leisure facilities, all of which are within a convenient walk and cycle of the Appeal Site; and,
 - The Appeal Site benefits from good access to public transport, which provide the opportunity for future site users to undertaken journeys by public transport.
- 3.6.2 On that basis, there are no reasons why the current planning application should be resisted or refused on transport accessibility grounds, and I am of the view that the current Appeal should be allowed and planning permission for the change of use of the Appeal Site should be granted.



APPENDIX A

MANUAL PTAL ANALYSIS



Mode	Max EDF	All other EDFs	Total AI
Bus	3.21	15.34	10.88
Rail	0.00	0.00	0.00
LUL	0.00	0.00	0.00

Total AI 10.88

PTAL 3

Mode	Stop	Route	Distance (metres)	Frequency (vph)	Walk Time	Scheduled Waiting Time (SWT)	Reliability	Average Waiting Time (AWT)	Total Access Time (TAT)	Estimated Doorstop Frequency (EDF)
Bus	Danebury Gardens	170	187.6313	6.00	2.35	5.00	2.00	7.00	9.35	3.21
Bus	Danebury Gardens	430	187.6313	6.00	2.35	5.00	2.00	7.00	9.35	3.21
Bus	Clarence Lane (Stop S)	265	564.95	6.00	7.06	5.00	2.00	7.00	14.06	2.13
Bus	Clarence Lane (Stop S)	419	564.95	5.00	7.06	6.00	2.00	8.00	15.06	1.99
Bus	Clarence Lane (Stop S)	493	564.95	5.00	7.06	6.00	2.00	8.00	15.06	1.99
Bus	Clarence Lane (Stop T)	265	611.69	6.00	7.65	5.00	2.00	7.00	14.65	2.05
Bus	Clarence Lane (Stop T)	419	611.69	6.00	7.65	5.00	2.00	7.00	14.65	2.05
Bus	Clarence Lane (Stop T)	493	611.69	5.00	7.65	6.00	2.00	8.00	15.65	1.92