# Orchard Hill

## Draft Statement of Public Consultation

October 2007

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<th>JOB NUMBER: 505 5203</th>
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1. INTRODUCTION

1.1 The Council recognises the importance of working in partnership with the local community in planning for the future development of the Borough. Sutton’s Statement of Community Involvement (SCI), which was adopted in July 2006, sets out the Council’s standards in relation to involving the community in the preparation of all local development documents. The purpose of the SCI is to ensure that all sections of the community and other interested parties have a reasonable opportunity to get involved from the earliest stages of policy preparation.

1.2 In line with the Planning and Compulsory Purchase Act 2004 and Planning Policy Statement 12 (PPS12) on ‘Creating Local Development Frameworks’, the Council is required to prepare a ‘Public Consultation Statement of Compliance’, stating how the arrangements for public consultation have met the requirements of both the Regulations and the SCI.

1.3 This Statement has been prepared by Consultants, Atkins Ltd, on behalf of the Council and sets out details of public consultation undertaken by the Council in the preparation of the Orchard Hill Supplementary Planning Document (SPD).

1.4 The remaining Sections of this document describe:

- Section 2: Background to the Orchard Hill SPD
- Section 3: Who was Consulted?
- Section 4: Consultation Methods
- Section 5: Consultation Issues
- Section 6: How Consultation Issues have been Addressed
- Section 7: Conclusions
2. BACKGROUND TO ORCHARD HILL SPD

2.1 The draft Orchard Hill Draft Supplementary Planning Document (SPD) was produced in accordance with the Planning and Compulsory Purchase Act 2004 for purposes of public consultation. It provides a planning and design framework to guide the redevelopment of Orchard Hill Hospital, Fountain Drive, Carshalton.

2.2 The SPD, when approved, will guide the development of the site and will assist the Council in determining future planning applications at the site. The SPD supplements policies contained in the Sutton UDP.

2.3 The draft SPD outlined two potential development options for the site:

- Option 1 – included the relocation of Stanley Park High School to the site under the Government’s Building School for the Future Programme with predominantly residential uses occupying the remainder of the site; and
- Option 2 – comprised of a residential-led scheme with public open space.

2.4 For both of the development options, the draft SPD would ensure that development of Orchard Hill is undertaken in an appropriate manner whilst reflecting its designation as a Major Developed Site within the Green Belt in the Sutton Unitary Development Plan in accordance with UDP Policy OE6. In particular the draft SPD considered the following issues in relation to the site:

- Its Green Belt location and high landscape value defined in the UDP;
- Sensitive neighbouring land uses including the Diamond Riding Centre and existing residential properties;
- Views of the site from areas outside of the site;
- Transport needs associated with the development; and
- Proximity to sensitive Sites of Importance for Nature Conservation (SINC) and a Scheduled Ancient Monument (SAM).
2.5 The draft SPD was accompanied by a Sustainability Appraisal, which provided an assessment of the effects of the guidance and was also subject to consultation. In addition, the draft SPD was supported by several Technical Appendices, which were available at the time of consultation.

2.6 When approved, the Orchard Hill SPD will be accompanied by a Statement of Community Consultation (this document), which identifies how the document was consulted upon and how the responses to consultation have been considered.
3. WHO WAS CONSULTED?

3.1 Sutton’s SCI sets out a list of statutory bodies specified by the Regulations and Government guidance that should be consulted in the preparation of local development documents. In addition, the SCI defines a range of categories of local organisations and stakeholders that should be involved in the plan preparation process. These include:

- Various racial, ethnic or national groups
- Religious groups
- Voluntary groups and groups representing disabled people
- Local businesses
- Young people
- Residents’ Associations
- Political groups, MPs, and local Councillors
- Area and issue based community fora
- Council departments
- Various residents/individuals who wish to be involved
- Other ‘general consultation bodies’
- Sutton’s Local Strategic Partnership (i.e. Sutton Partnership)

3.2 The Council made use of its existing database of consultees, along with an extensive database of active local organisations already developed by the Sutton Partnership, to produce a comprehensive list of relevant organisations. Each was sent a copy of the draft SPD. In accordance with e-government objectives, material was sent to consultees by e-mail wherever possible.

3.3 The full list of groups sent copies of the draft SPD and leaflet is set out in Appendix A.
4. CONSULTATION METHODS

4.1 The draft Orchard Hill SPD was approved for public consultation by The Executive on 9 July 2007. Formal public consultation took place between 17 July and 17 September 2007.

4.2 The following methods were used in line with the minimum Government requirements for consultation on SPDs set out under the Regulations and procedures set out in the SCI:

- Prior to the start of the consultation period on 17 July 2007, the Council sent approximately 50 paper or email copies of the draft SPD, leaflet and all other supporting information to the Specific and General consultees and 33 letters or emails and leaflets informing other interested people or groups of the consultation arrangements and where to access information.

- Further copies of the draft SPD and accompanying information was made available for inspection in the following locations:
  - 2 at each of the 10 Libraries in the Borough
  - 2 at the Civic Offices and 2 at Denmark Road Offices
  - 20 at each of the 2 exhibitions
  - Copies of the draft SPD and leaflet (with supporting technical annexes and sustainability appraisal) were made available on the Council’s website at www.sutton.gov.uk/planning together with an introductory page;

- In addition 15 Councillors (Members of the Carshalton Local Area Committee, Strategic Planning Group and the Executive Member for Children, Young People & Learning Services) received the document.

4.3 A leaflet was also prepared which provides a summary of issues and proposals and details of all consultation opportunities (a copy of the leaflet is included in Annex B). The consultation leaflet indicated where copies of the draft SPD were available for inspection over the consultation period and details of where the draft SPD could be
viewed on-line via the Sutton website. A free post reply coupon was included within the leaflet. Further details of consultation arrangements are set out in Section 4 of this document.

4.4 The Council sent approximately 2,700 leaflets distributed to residents in the surrounding area. In addition 675 leaflets were sent to Stanley Park High School, 225 left in Carshalton and Wallington Libraries and electronic versions were made available on Council website.

4.5 A formal notice of public consultation was prepared and published in the Sutton Post.

Exhibition

4.6 Permanent exhibitions on the draft SPD proposals were put up at Carshalton and Wallington Libraries between July 17th and September 17th. Exhibitions were staffed at Carshalton Library on the following days and times:

⇒ Wednesday 18th July 15:00 - 17:00
⇒ Thursday 19th July 10:00 - 12:00
⇒ Friday 20th July 16:00 - 18:00
⇒ Saturday 21st July 10:00 - 12:00
⇒ Tuesday 24th July 17:00 - 19:00
⇒ Wednesday 25th July 15:00 - 17:00
⇒ Thursday 26th July 10:00 - 12:00
⇒ Friday 27th July 15:00 - 17:00
⇒ Tuesday 4th September 17:00 - 19:00
⇒ Wednesday 5th September 10:00 - 12:00
⇒ Friday 7th September 15:00 - 17:00
⇒ Saturday 8th September 10:00 - 12:00

4.7 A public workshop was held on 24th July between 19:30 and 21:30 at Stanley Park Junior School, Carshalton.

4.3 In dealing with consultation responses received on the draft SPD between 17 July and 17 September 2007, the Council:

• Acknowledged all responses made;

• If appropriate contacted respondents if clarification of any points was needed.

• Summarised responses

• Prepared a report to Councillors on all responses, and set out the Council’s views on these including recommendations on the way forward.
• Contacted respondents when and where the report of this outcome is available.

4.8 The SPD together with the proposed changes was considered at the Council’s Strategic Planning Group on 25 October 2007 and forwarded to The Executive for approval on 6 November.
5. RESPONSES TO THE CONSULTATION LEAFLET

5.1 The consultation leaflet provided a summary of the draft SPD proposals and an opportunity to make comments on the proposals in the form of a questionnaire and reply paid coupon. Whilst the draft SPD identified two possible options for the future development of the site, the purpose of the consultation was not to select a single option but to receive feedback on content of both options and the overall, vision, development principles and implementation framework outlined in the draft SPD.

5.2 The consultation was structured around 7 key questions. Respondents were also invited to provide any further comments and a space was provided for this purpose.

Table 5.1 – Summary of questionnaire responses

<table>
<thead>
<tr>
<th>Issue</th>
<th>Support</th>
<th>Neutral</th>
<th>Oppose</th>
<th>Undecided</th>
<th>Unanswered</th>
</tr>
</thead>
<tbody>
<tr>
<td>To what extent do you agree with the following?</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The concept of redeveloping Orchard Hill when the hospital is closed</td>
<td>398</td>
<td>67</td>
<td>11</td>
<td>89</td>
<td>15</td>
</tr>
<tr>
<td>Relocating Stanley Park High School to the Orchard Hill Site</td>
<td>333</td>
<td>56</td>
<td>33</td>
<td>6</td>
<td>202</td>
</tr>
<tr>
<td>Providing a mixture of higher and lower density residential development</td>
<td>144</td>
<td>24</td>
<td>166</td>
<td>28</td>
<td>210</td>
</tr>
<tr>
<td>Creating a new access to Orchard Hill from Woodmansterne Road</td>
<td>289</td>
<td>49</td>
<td>70</td>
<td>12</td>
<td>193</td>
</tr>
<tr>
<td>Improving public transport by re-directing bus S4 to serve the site</td>
<td>389</td>
<td>66</td>
<td>84</td>
<td>14</td>
<td>86</td>
</tr>
<tr>
<td>Creating new areas of open space and enhancing links to the green belt</td>
<td>437</td>
<td>74</td>
<td>87</td>
<td>15</td>
<td>37</td>
</tr>
</tbody>
</table>

5.3 There was general support (two thirds of respondents) for concept of redeveloping the site when the hospital closes.
5.4 Relocation of Stanley Park School to the site was supported by a majority of respondents with a third opposing the relocation.

5.5 The response to providing a mixture of residential development was divided. Just over a third were opposed to a mixture of higher and lower density housing, with the balance split between neutral, support and undecided.

5.6 Around half of respondents supported a potential new access to Woodmansterne Road with a third opposing such a road. Two thirds supported improving public transport and three quarters of respondents supported the creation of new areas of open space and enhancing links to the Green Belt.

5.7 An analysis was undertaken of those who supported the relocation of the school to identify their views in relation to the access road which would likely to be required to support the proposals (refer to Table 5.2). Just over half of these respondents supported the access road, whilst around one third opposed having an access road to serve the school.

Table 5.2 – Views on the creation of an access road among supporters of the school relocation

<table>
<thead>
<tr>
<th>Response to Question the Creation of a new access to Orchard Hill from Woodmansterne Road</th>
<th>No. Responses</th>
<th>% of Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unanswered</td>
<td>2</td>
<td>0.6</td>
</tr>
<tr>
<td>Neutral</td>
<td>35</td>
<td>10.5</td>
</tr>
<tr>
<td>Oppose</td>
<td>108</td>
<td>32.4</td>
</tr>
<tr>
<td>Support</td>
<td>172</td>
<td>51.7</td>
</tr>
<tr>
<td>Undecided</td>
<td>16</td>
<td>4.8</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>333</strong></td>
<td><strong>100</strong></td>
</tr>
</tbody>
</table>

5.8 Respondents were also requested to identify what other uses or facilities they think should be required as part of the redevelopment of the site. The number of mentions of each type of facility is identified. The facilities mentioned included sports centre, retail, swimming pool, GP Surgery/health centre, open space and children’s playground (refer to Table 5.3).
## Table 5.3 – Additional Facilities Requested.

<table>
<thead>
<tr>
<th>Facility</th>
<th>No. of Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sports Centre</td>
<td>28</td>
</tr>
<tr>
<td>Retail</td>
<td>21</td>
</tr>
<tr>
<td>G.P Surgery/ Health Centre</td>
<td>20</td>
</tr>
<tr>
<td>Open Space/ Park</td>
<td>19</td>
</tr>
<tr>
<td>Childrens Playground</td>
<td>18</td>
</tr>
<tr>
<td>Swimming Facilities</td>
<td>14</td>
</tr>
<tr>
<td>Improved public transport (Bus)</td>
<td>9</td>
</tr>
<tr>
<td>No Development</td>
<td>8</td>
</tr>
<tr>
<td>Community Centre</td>
<td>8</td>
</tr>
<tr>
<td>Specialist care - Rehabilitation Unit; Childrens Hospice; Day centre</td>
<td>7</td>
</tr>
<tr>
<td>Recreation facilities</td>
<td>7</td>
</tr>
<tr>
<td>Playing Fields</td>
<td>5</td>
</tr>
<tr>
<td>Dental Practice</td>
<td>5</td>
</tr>
<tr>
<td>Segregated Cycle Lanes</td>
<td>5</td>
</tr>
<tr>
<td>Car-Parking</td>
<td>5</td>
</tr>
<tr>
<td>Outdoor all weather multi-purpose sports field</td>
<td>4</td>
</tr>
<tr>
<td>Beaches Care Foundation Project</td>
<td>4</td>
</tr>
<tr>
<td>Hospital</td>
<td>3</td>
</tr>
<tr>
<td>Ecology Centre</td>
<td>3</td>
</tr>
<tr>
<td>Public House</td>
<td>3</td>
</tr>
<tr>
<td>Social Housing</td>
<td>3</td>
</tr>
<tr>
<td>Primary School</td>
<td>3</td>
</tr>
<tr>
<td>School Bus</td>
<td>3</td>
</tr>
<tr>
<td>Improved access (general)</td>
<td>3</td>
</tr>
<tr>
<td>Post Office/ Box</td>
<td>2</td>
</tr>
<tr>
<td>Special needs Housing</td>
<td>2</td>
</tr>
<tr>
<td>Sheltered Housing</td>
<td>2</td>
</tr>
<tr>
<td>Nursery/ Childcare facilities</td>
<td>2</td>
</tr>
<tr>
<td>New access road</td>
<td>2</td>
</tr>
<tr>
<td>Improved Lighting</td>
<td>2</td>
</tr>
<tr>
<td>Recycling facilities</td>
<td>1</td>
</tr>
<tr>
<td>School</td>
<td>1</td>
</tr>
<tr>
<td>Toilets</td>
<td>1</td>
</tr>
<tr>
<td>Police Station</td>
<td>1</td>
</tr>
<tr>
<td>Library</td>
<td>1</td>
</tr>
<tr>
<td>High density Housing</td>
<td>1</td>
</tr>
<tr>
<td>Low density Housing</td>
<td>1</td>
</tr>
<tr>
<td>Mobile Home Park (for adults)</td>
<td>1</td>
</tr>
</tbody>
</table>

5.9 Further comments on the range of facilities to be provided in the other responses, include the Cyclists Touring Club, which requested a range of cycle facilities including a walking/cycling circuit, ball park, BMX area, storage/pavilion type building and Sheffield stands.
5.10 In terms of the other issues raised by residents in the other comments the key issues raised were:

- Support and opposition in relation to the principle of relocating the school;
- Impact of the proposals on the local road network;
- Comments in relation to the access road (for and against);
- Opposition to a cycle route passing through Wellfield Gardens;
- In relation to the S4 bus route some residents supported diverting the route, others objected to a change from its existing route. Others opposed routing the S4 down Kennedy Drive;
- Support for a residential care use to be located at Orchard Hill;
- Need to consider existing residents at the site and the provision of suitable replacement accommodation;
- Comments relating to affordable housing (with a majority supporting housing but with some against the principle);
- Pressure of residential development on local public services; and
- Support for keeping the site as open land.

QUEEN MARY’S CHRISTIAN CARE FOUNDATION CONSULTATION RESPONSES

5.11 The Queen Mary’s Christian Care Foundation (QMCCF) expressed their aspirations for the Orchard Hill site at the public meeting. They explained that the QMCCF wanted to provide a range of facilities including:

- extra-care housing (privately owned and socially funded);
- intermediate care facilities/rehabilitation i.e. post operative care for people with long term diseases in need of respite care;
- extra care village
• a long stay specialist unit for dementure;
• key worker housing;
• a central hub which could include a café, restaurant, gym, IT centre, library
  health and social care

5.12 This central hub could also be open to the public. Other parts of the proposals put
forward including conserving one of the bungalows on the site which was used to
pioneer the “sunshine treatment” therapies for use as a community museum
highlighting the history of the site.

5.13 They felt that current use of the site is for health care facilities and therefore at least
part of the site should have been earmarked for health care facilities. Indeed, two
further options should have been included in the draft SPD: Option 3 for health and
social care and Option 4 for health and social care and a school.

5.14 The QMCCF further engaged in the consultation process by encouraging residents
and interested parties to respond to the Orchard Hill leaflet and questionnaire
circulated by LBS. However, they felt that so many respondents expressed concern
about the failure to include the Beeches Park proposals as an option, that they
should issue their own consultation cards. Cards were delivered to approximately
2,000 homes in the Carshalton area with an explanation leaflet (see Appendix A).
Cards were also made available at the Carshalton Fayre and mailed to contacts that
receive the QMCCF’s newsletter.

5.15 A total of 122 responses were received, of which 91 were considered in QMCCF’s
analysis as they had verifiable addresses as follows:

• Question 1: I/we support that the planning brief for Orchard Hill should be for
  mixed use allowing residential, healthcare facilities and other community facilities
  – 85% were in favour, 7% were against and 8% were unsure or did not reply;

• Question 2: I/We support that the uses considered by Consultants for the Council
  of housing or school and housing are too narrow – 77% were in favour, 4% were
  against and 19% were unsure or did not reply;

• Question 3: I/we support the rebuilding of Stanley Park High School on part of
  Orchard Hill – 29% were in favour, 47% were against and 24% were unsure or
  did not reply; and
• Question 4: I/we support the Beeches Vision as a viable option for the Orchard Hill site – 89% were in favour, 4% against and 7% were unsure or did not reply.

5.16 A range of further comments was provided on the QMCCF consultation cards. A majority favoured providing school facilities, although there was a mixed response as to whether a new school should be built or whether the school should be kept on its existing site. There were no clear reasons given for keeping the school on its existing site beyond questioning a reason for moving it. Reasons given for the relocation of the school included that the current site was too small and that improved sports facilities could be provided.

5.17 There was only one response advocating 100% housing on the site. No matter what the final preferred option, there were a number of concerns about access and transport arrangements at the site with potential congestion, parking and public transport provision considered important.
6. CONSULTATION ISSUES AND RECOMMENDED RESPONSES

GENERAL COMMENTS

6.1 The GLA commented that the draft SPD contains many welcome elements and is clear, concise and logical overall, although issues relating to conformity with the London Plan were highlighted where adopted LB Sutton’s UDP and SPDs follow an alternative approach to the London Plan.

6.2 Response/Recommendation: Issues relating to conformity are reviewed in detail below, although as a general point the draft SPD supports adopted UDP policies. Discussion relating to Borough wide targets and policy are best addressed through the Core Strategy process.

SCOPE OF THE SPD

6.3 The owners of the former BIBRA site commented that their site should be included within the SPD boundary, particularly as the possible access road crosses their site which they consider to be contrary to Green Belt Policy OE1.

6.4 Response/Recommendation: The redevelopment of the BIBRA site would be contrary to the adopted UDP Policy OE1, and was therefore excluded from the draft SPD. The Council considers that the construction of an access road, which may be required to support the development of the allocated Major Developed Site, would be an acceptable use in the Green Belt in accordance with Policy OE1.

Closure of the Existing Hospital

6.5 A number of respondents were opposed to the closure of the existing Hospital and expressed concern about the future of existing site residents.

6.6 Response/Recommendation: The decision to close Orchard Hill Hospital was made by Sutton & Merton Primary Care Trust (S&M PCT) due to evolving Government policy on delivering disability services and the outdated nature of the buildings at Orchard Hill. The PCT is responsible for providing alternative arrangements for existing residents.
USES INCLUDED AND OPTIONS CONSIDERED

Beeches Park Concept: Health and Social Care

6.7 As mentioned in Section 6 above, the QMCCF and a large number of other respondents (particularly those who responded to the QMCCF questionnaire) expressed a view that health and social care facilities should be provided within the site. A range of additional facilities were mentioned by QMCCF as being suitable for the site these included extra care housing, intermediate care facilities and community facilities including shops, cafes, a restaurant, gym, library and museum.

6.8 QMCCF and their supporters identified that two further options including these uses should have been shown in the draft SPD with the predominant use being a health facilities either with or without the school.

6.9 **Response/Recommendation:** Both draft SPD options included scope for future residential uses, which could encompass residential institutional uses, such as residential care homes, nursing home or the extra care concept suggested along with ancillary uses. Whilst these uses are encompassed within the draft document, it is recommended that the final SPD should include further guidance that explicitly refers to the possible development of residential institutional uses. As such it is not considered appropriate to set out or consult on further options to those included in the draft SPD.

6.10 The PCT is the landowner and their intentions are to dispose of the site as it is no longer required for their purposes. A care provider for the elderly would either need to negotiate with the PCT for the purchase of part of the site or could partner with the residential developer to provide specialist elderly care accommodation as part of the affordable housing component. However, it is important that the options set out in the final SPD are realistic and achievable.

Community facilities provision

6.11 S&M PCT expressed concern about the requirement to consider provision of community facilities on the site, and suggest that the need for facilities should be established through a needs assessment.

6.12 The community consultation identified a range of community uses which it was felt would be beneficial to accommodate on the site including a range of open space, sport and leisure uses, local shopping and healthcare provision.

6.13 **Response/Recommendation:** The concerns of S&M PCT are noted. It is considered appropriate for the SPD to identify within the description of Options that
the provision of ancillary community facilities, including local retail, primary healthcare, sport and leisure facilities, as set out in Table 5.3, are appropriate uses for the site, and that these could form part of a community facilities hub. It is recommended that a requirement for developers to carry out a needs assessment for community facilities as part of the submission of a planning application for the site is included within the final SPD.

SECONDARY SCHOOL

The Principle of Developing the School on the Site

6.14 A range of views were expressed about the idea of developing a secondary school at Orchard Hill, with strongly voiced feelings both for and against. Supporters comments included the need for the school, the opportunity provided by the site and the chance to build on current improvements to Stanley Park High School through delivery of a high quality facility. Objectors tended to focus on the impacts of the school on the surrounding area in terms of traffic, amenity and property values, as well as teenagers loitering and creating security and nuisance problems. Many of these consultees felt that the school should be re-provided on the existing site.

6.15 Response/Recommendation: It is recommended that Options 1 and 2 from the draft SPD should be considered sequentially, with Option 1 (as amended) being identified as the 'Preferred Development Proposals' and Option 2 (as amended) being identified as 'Alternative Development Proposals' in the final SPD.

Impacts of the School

6.16 Transport impacts of the school were a key concern raised by a large number of consultees. Key issues related to the impacts of additional traffic on local roads and junctions. Concern was expressed about the site’s poor public transport provision. Contrasting views were expressed about the new access road to Woodmansterne Road, with some consultees regarding this as essential (in some cases whatever option is developed) while others strongly objected, considering that this would cause traffic problems on the Woodmansterne Road and surrounding streets. CYPLS identify that there could be a number of ways of making appropriate access to the school site which may not necessarily include a new access road.

6.17 Response/Recommendation: It is recommended that the final SPD should include an expanded section relating to the package of transportation measures to reflect further technical work, which has been undertaken since the draft SPD was issued and which should be taken into account in determining future planning applications for the site. It is considered that the access road proposed in the draft SPD is required in relation to the 'Preferred Development Proposals, predominantly to
accommodate school buses and teachers and visitors to the school, with restrictions to limit general access and prevent ‘rat running’ through the site.

6.18 A number of respondents also expressed concern about the impact of the school on wildlife in the local area.

6.19 **Response/Recommendation:** It is considered that appropriate consideration has been given to ecological factors in identifying site layout principles included within the draft SPD.

**School Design and Site**

6.20 The Council’s Children, Young People and Learning Service (CYPLS), which are responsible for schools, has provided a commentary on the background and vision for the secondary school and explained that a north-south orientation of the facilities is preferred over an east-west orientation.

6.21 **Response/Recommendation:** The guidance in the draft SPD explains that the layout shown is an indicative scheme complying with UDP policies and not a fixed layout. It is recommended that further text should be added to the final SPD to confirm that, subject to complying with UDP policies, a north-south orientation of the school buildings would also be equally suitable.

**School Entrance**

6.22 The CYPLS raised a question about the entrance to the school as shown in Figure 4.4 in the draft SPD, and in particular the lack of an indicative entrance on the northern side of the school to connect with the community to the north.

6.23 **Response/Recommendation:** The draft SPD shows a purely indicative layout for the site. The road layout and land parcels are likely to change as detailed designs are developed. The location of the school entrance, should the Preferred Development Proposals be pursued, will be a matter for detailed design. Provision of the main school entrance to the west would tie in with the new access road, proposed as part of the final SPD. However, a further entrance on the northern side of the site would also be required as suggested, and it is recommended that this requirement should be added to Figure 4.4 of the final SPD.

6.24 The CYPLS raised concerns about the “Edge Access Route” for pedestrians and cyclists proposed to run along the south of the school buildings, separating the buildings from outdoor facilities, as well as broader concerns about public accessibility and security.
6.25 **Response/Recommendation:** The intention of the draft SPD is to maximise pedestrian and cycle connections across the site, although the issue relating to severance of school facilities is recognised. The route of the pedestrian and cycle access in the draft SPD is indicative only, and this issue should be dealt with through detailed design, fencing, alignment and management of the route as part of the submission of a planning application for the site.

### Outdoor Facilities and Trees

6.26 The CYPLS sought flexibility regarding the retention of significant clusters of trees south of the ridgeline, which it was felt could compromise the provision of large playing fields and pitches.

6.27 **Response/Recommendation:** This issue is noted and the need for flexibility is recognised. The draft SPD prioritised identified clusters of trees for retention, but stated that where retention is not possible or appropriate, replacement trees should be planted.

### Car Parking

6.28 The CYPLS expressed concern about the number of car parking spaces provided for staff in relation to staffing levels. The SPD includes a limit of 104 cars.

6.29 **Response/Recommendation:** The maximum number of car parking spaces was identified on the basis of Council and GLA car parking standards, which reflects the indicative level of staff. The number of spaces to be provided would depend on the exact number of staff.

### HOUSING

#### The Principle of Residential Development

6.30 A number of respondents objected to the redevelopment of the site for residential uses. Many of these felt that the site should be open space or parkland. Concerns focused around the already congested nature of the Borough and the additional pressure that new residents would have on local facilities.

6.31 **Response/Recommendation:** The UDP does not specify uses, which are appropriate for the Major Developed Site portion of Orchard Hill. A range of uses would be appropriate including residential development accompanied by appropriate community facilities. A scheme which comprised entirely of open land is unlikely to be deliverable due to the need for alternative healthcare facilities to be provided as a result of the closure of the Orchard Hill hospital site.
Affordable Housing

6.32 A number of consultees commented on affordable housing. Generally, there was support for affordable housing provision on the site, with consultees explaining that there is a need to deliver low cost housing locally.

6.33 The Council’s Housing Enabling Team suggested that the requirement to build affordable housing so that it is indistinguishable from the private housing be added to the Design Principles. The affordable housing should represent pro-rata the type of housing provided over the whole scheme in terms of mix of sizes and type, and should be pepper-potted through the site. The Housing Corporation Standards referred to the Mayor’s recently launched Housing Strategy which requires larger homes in affordable developments could be included.

6.34 **Response/Recommendation:** It is recommended that these requirements should be incorporated into the housing guidance in the final SPD.

6.35 The Council’s Housing Enabling Team supported the target level of 40% affordable housing and the split of rented and intermediate housing. By way of information, the GLA noted the need to ensure that variation from a 50% borough wide affordable target in the Core Strategy will need to be fully justified, and the Housing Corporation advised that their preference would be for a 50% affordable housing target. In contrast, S&M PCT expressed concern about achieving a target of 40% affordable housing, given the financial viability of any proposal.

6.36 **Response/Recommendation:** The draft SPD was based on adopted local policy, (in this case the Affordable Housing SPD, 2006, which supports adopted UDP policy and London Plan policy). The appropriate level of affordable housing on the site would be subject to negotiation with the developer at the planning application stage, based on the criteria set out in policy. In particular, the issue of financial viability is important given the need for the PCT to provide alternative accommodation for Orchard Hill residents. It is recommended that the target of at least 40% affordable housing should remain in the final SPD, and that text should be added to explain that the level of affordable housing provision would be subject to financial assessment using the GLA affordable housing tool kit.

Density

6.37 The GLA noted the density ranges proposed by the draft SPD and noted that any densities below 30 units per hectare would raise concerns. S&M PCT were concerned about restricting density to 50 dwellings per hectare, and stated that higher density should be considered if it can be demonstrated that the scheme does
not adversely affect the amenity of existing or future residents or the openness of the
Green Belt.

6.38 **Response/Recommendation:** It is important to note that the density range set out in
the draft SPD is based on policy in the London Plan, which is concerned with
accessibility and location. It is not appropriate for the SPD to specify additional
criteria relating to detailed site layout and design, which are addressed in the
Council’s Urban Design SPD. It is recommended that no change should be made to
overall the density levels within the final SPD.

### Building Heights

6.39 S&M PCT raised the issue of building heights, pointing out that the draft SPD has
overlooked the fact that modern building standards may mean that a 4-storey
building could be accommodated within the heights of existing 3-storey buildings
within the site.

6.40 **Response/Recommendation:** This point is noted and it is recommended that
guidance on building heights in the final SPD should recognises the existing heights
of the former hospital buildings on the site.

### Standards for Residential Units

6.41 The Council’s Housing Enabling Team and the Housing Corporation made a number
of comments on the requirements for standards to which the residential units will be
built (e.g. Parker Morris standard, Housing Corporation “Quality and Design”
standards). It was also noted that public funding for the affordable housing element
would only be supported if an independent feasibility report was produced to
demonstrate the need for subsidy, and that this should be mentioned in the SPD.

6.42 **Response/Recommendation:** it is recommended that these standards should be
referred to in Section 5 of the final SPD.

### Sensitive Edges and Overlooking

6.43 A number of respondents were concerned about the impact of residential
development on adjacent properties. Issues raised included overlooking by the
proposed development on the northern part of the site into existing properties and the
need to retain trees along boundaries.

6.44 **Response/Recommendation:** The draft SPD recognised the issue of sensitive
edges as shown in Figure 4.1. The indicative layouts showed parcels of land for
residential development, but the location of buildings was not specified. The detailed design of residential development should be considered at the planning application stage, when issues such as overlooking would be addressed. It is recommended that the annotation on Figure 4.1 for sensitive edges should be extended to include all the interfaces between the Orchard Hill site and existing residential development, and that the need to avoid overlooking should be referred to in the final SPD.

**Land Ownership**

*6.45 The Queen Elizabeth’s Foundation stated that the area of land shown in Figures 4.3 and 4.5 as lower density residential development (Land Parcel C) to the north of the Mobility Centre is in its ownership and currently accommodates grassland and a bungalow.*

*6.46 Response/Recommendation: it is recommended that the ownership of Queen Elizabeth’s Foundation is reflected in the final SPD. As landowner, the Foundation has the discretion to decide whether or not to sell the land for development as envisaged by the final SPD or retain it in its current use.*

**Open Space and Play Space**

*6.47 The London Parks and Garden Trust supported the enhancement of existing open space and the creation of new public open space in Option 2 of the draft SPD. A number of other consultees also supported the provision of open space within the site.*

*6.48 S&M PCT stated a need to provide more site-specific guidance on the provision of open space, private amenity space and play space facilities, given the high level of provision of open space in the local area.*

*6.49 Response/Recommendation: Appropriate standards for open space provision are identified in the draft SPD. It is recommended that further guidance on indicative provision levels relating to both the Preferred and Alternative Development Proposals should be identified in the final SPD.*

**TRANSPORT AND ACCESS**

**Access Road from Woodmansterne Road**

*6.50 A number of respondents queried why the new access road is suggested from the south west when most children will be coming from the north and east. There was concern that the new access road would simply shift the predicted capacity problem.*
CYPLS was also concerned that diverting school access via the west of the site may prolong travel distances and discourage greener travel modes.

6.51 **Response/Recommendation:** Woodmansterne Road is the only suitable option for a new access road as it is not possible to provide a suitable link to the north east of Orchard Hill. The access road is should be controlled, with access restricted to school buses and those requiring access to the school in order to prevent ‘rat running’ through the Orchard Hill site. It is recommended that the construction of the access to the west should be accompanied by measures to encourage walking, cycling and bus trips by making them relatively convenient for pupils and staff accessing the school from the north and east. It is likely that the school catchment will adjust gradually following relocation.

6.52 The GLA stressed that the new access road should be designed to meet the needs of all users including pedestrians, cyclists and buses.

6.53 **Response/Recommendation:** The GLA’s comment is noted and agreed.

### Traffic Impacts

6.54 A number of respondents raised concerns about the traffic impacts of the development of the Orchard Hill site. The specific issues raised focused on the impacts on local roads and junctions, many of which are considered to already be congested. Impacts on Fountain Drive were mentioned, with respondents considering the road to be too narrow to accommodate the increase in traffic. Some stated that there is insufficient road space to safely accommodate additional cycle and pedestrian facilities.

6.55 **Response/Recommendation:** The draft SPD included a range of mitigation measures to address potential impacts on the local road network. The existing traffic calming measures along Fountain Drive reduce the capacity of the road and could result in unnecessary queuing in relation to the Preferred Development Proposals. The draft SPD indicated that the existing arrangement should be replaced. The most appropriate arrangement is likely to include raised plateaus, which would allow both lanes to be utilised along its length and the widening of the pavement to accommodate increased pedestrian flows to the school. The Council’s Local Implementation Plan already proposes to include a new cycle route along Fountain Drive.

6.56 The draft SPD identified the measures required to mitigate the transport implications of the development options. S&M PCT draw attention to the fact that no supporting information was supplied as part of the SPD consultation material to endorse these recommendations.
6.57 **Response/Recommendation:** This supporting information was contained in the Orchard Hill Transport Statement which was available on the Council’s website throughout the consultation period.

6.58 S&M PCT point out that traffic generation attributable to the solely residential option would be lower than what is currently generated by the site. Consequently the PCT considers it inappropriate that the SPD requires specific infrastructure improvements for a 100% residential scheme.

6.59 **Response/Recommendation:** It is noted that a solely residential option would result in a decrease in traffic flows during the am peak. However a slight increase in flows is forecast during the pm peak. The increase in traffic flows will have a negligible impact on the majority of the surrounding road network, and the draft SPD did not propose changes to the traffic calming measures along Fountain Drive. However the additional residential development will exacerbate the existing capacity issues at the Beeches Avenue / Stanley Park Road junction. Nevertheless due to the increase in traffic flows through the junction being relatively small, it is not recommended that the developer should wholly fund its signalisation. The other proposals identified for a new pedestrian crossing on Stanley Park Road and extension of cycle lanes are appropriate in relation to the Preferred Development Proposals. This should be reflected in the final SPD, albeit on the understanding that proposed number of residential units would not increase substantially and that all existing traffic generators on the Orchard Hill site would be removed.

### Car Parking

6.60 The GLA raised concerns about over-provision of car parking, and noted that while the draft SPD conforms with adopted UDP policy, this does not conform with the London Plan.

6.61 **Response/Recommendation:** Car parking is proposed in line with adopted UDP policy. Any borough wide issues of conformity are best dealt with through the discussions over the Core Strategy or relevant part of the Local Development Framework.

### Public Transport

6.62 A number of respondents expressed concern about the possibility of re-routing the S4 bus route through the emergency entrance at the end of Stanley Road. It was suggested that the residential roads are too narrow to accommodate the bus, and that parked cars would make it impossible for the bus to pass. Safety concerns were also raised. A number of consultees expressed concern about the re-routing of the
S4 bus service away from the existing route, stating that they would no longer have easy access to this service.

6.63 **Response/Recommendation:** Any diversion of the S4 bus would require TfL approval. This would include further investigations into the feasibility of alternative routes which would address whether Kenny Drive is suitable or not, but Kenny Drive is not the only possible route diversion.

6.64 TfL stated that they would welcome discussions with The Council and the site developers to investigate ways of improving public transport accessibility to the site and encourages the development of a Travel Plan for this site, as well as a School Travel Plan if this option is developed.

6.65 **Response/Recommendation:** It is recommended that the final SPD should include the requirement for a Travel Plan to be prepared for the residential component.

6.66 CYPLS requested clarification on how the vehicular access to the site would work in terms of providing “drive to not through” access for private cars to avoid rat running, but through access for buses.

6.67 **Response/Recommendation:** The supporting Transport Statement explains that this restriction could be achieved through some form of bollard/gate system.

6.68 S&M PCT stated that any diversion of the S4 bus route will be subject to obtaining agreement from the bus operating companies and TfL and require a business case, and this should be mentioned in the SPD.

6.69 **Response/Recommendation:** This suggestion is noted and it is recommended that appropriate wording should be incorporated in the final SPD.

**Pedestrian and Cycling Issues**

6.70 The Cyclists Touring Club provided a number of detailed comments on provision for cyclists, that access to the Park (presumably the Orchard Hill site) for pedestrians and cyclists should be available from all directions; that roundabouts are unhelpful for pedestrians and cyclists; and all paths must be designed for shared use.

6.71 Concerns were raised about the safety of providing a cycle and pedestrian access through Wellfield Gardens. Respondents noted the lack of pavements. Concerns were also expressed about the cul-de-sac being used as a drop-off point, the significant increase in activity in the street and covenant affecting deliverability.
6.72 **Response/Recommendation:** The draft SPD sought to maximise connections between the site and the surrounding area and encourage people to walk and cycle rather than use private cars. The principle of a cycle route is identified in the UDP, although this need not necessarily be along Wellfield Gardens. It is recommended that an amendment to the indicative route along the proposed new access road should be shown in the final SPD.

**BUILT HERITAGE**

**Archaeology**

6.73 The CYPLS raises a concern about the buffer zone for the Scheduled Ancient Monument (SAM) which lies on the south east corner of the site, and the clarity of text within the draft SPD relating to this. Concern was expressed about the buffer zone restricting the provision of outdoor facilities and landscaping, and the existence of buildings within the buffer zone was highlighted.

6.74 **Response/Recommendation:** This comment is noted and it is recommended that the final SPD should better reflect the guidance within the supporting Technical Study on Heritage and provides clarification of the requirements relating to the site. The boundary shown on Figure 2.1 of the draft SPD related to the boundary of the SAM but also defined the boundary of the buffer zone.

**Existing Buildings**

6.75 A number of respondents commented on the quality of the existing buildings, queried whether or not any of these should be listed and raised the issue of retaining some or all of the existing buildings.

6.76 **Response/Recommendation:** The supporting Technical Statement on Heritage considered the architectural and historic value of the existing buildings and made recommendations, which should be incorporated in the final SPD.

6.77 S&M PCT stated that buildings are not of architectural or historic interest and provided a Historic Building Assessment.

6.78 **Response/Recommendation:** It is recommended that the final SPD should reflect these comments, whilst still requiring developers to demonstrate that retention is not feasible and to record the relevant buildings prior to demolition.
ECOLOGY AND TREES

Management of Public Open Spaces and the Site of Interest for Nature Conservation

6.79 Some respondents expressed concern about the impact on nature conservation of increasing public access to the Site of Interest for Nature Conservation (SINC). The GLA noted a key opportunity for habitat creation of chalk grassland at the existing open space to the south east of the SPD boundary.

6.80 **Response/Recommendation:** The supporting Technical Study on Ecology recommends that a Management Plan should be prepared for the SINC, which would allow for public access to certain areas, while other areas are bought under conservation management. It is recommended that this guidance should be reflected in the final SPD.

Retention of Trees

6.81 A number of consultees noted the existing high quality landscape framework of the site and highlighted the need to retain trees.

6.82 **Response/Recommendation:** The approach to retaining trees set out in the draft SPD is appropriate although there is a need for flexibility in considering the retention of trees, and it is recommended that this should be reflected in the final SPD. The status of individual tree clusters is a detailed matter, which should be dealt with at the planning application stage.

SUSTAINABILITY APPRAISAL AND ENVIRONMENTAL STATEMENT

Planning application and Environmental Statement

6.83 The S&M PCT requested further advice on whether an EIA would be required.

6.84 **Response/Recommendation:** It is recommended that the final SPD should provide further guidance on these matters, requiring an Environmental Statement to be prepared in relation to the Preferred Development Proposals but not in relation to the Alternative Development Proposals.

Sustainability

6.85 While the GLA welcomes references to climate change issues and sustainable design and construction, a more ambitious policy stance was encouraged. An onsite
renewable energy target of 20% was advocated to reflect emerging policy, possibly including a local energy scheme, and at least demonstrating that the proposed heating and cooling systems have been selected in accordance with the Mayor’s order of preference. The implementation section should include a requirement for an energy strategy, and energy efficiency principles should be incorporated into the guidance. Reference should be made to the Mayor’s Sustainable Design and Construction SPG.

6.86 **Response/Recommendation:** These comments are noted and should be reflected in the final SPD.

**BREEAM, EcoHomes Standards and the Code for Sustainable Homes**

6.87 The Council’s Housing Department stated that the SPD should mention the emerging Code for Sustainable Homes and would welcome a minimum level of 4 being included in the guidance. In contrast, S&M PCT commented that issues such as the site’s poor public transport accessibility may prevent the ‘Excellent’ EcoHomes rating being achieved. The need to secure sustainable design and construction was also mentioned by questionnaire respondents.

6.88 **Response/Recommendation:** The scoring systems for building sustainability include a wide range of issues including energy, materials, pollution and ecology, as well as transport. It is considered that there is sufficient breadth and flexibility within the scoring systems to enable developers to achieve the ‘Excellent’ rating. It is recommended that a reference should be made in the final SPD to Sustainable Homes Standards.

**PHASING AND IMPLEMENTATION**

**Delivery of Infrastructure Improvements and Facilities to Support Development**

6.89 CYPLS raised a query about how the residential and school components would contribute to off-site transport mitigation measures and management of the SINC and public open space if Option 1 of the draft SPD were developed.

6.90 **Response/Recommendation:** It is recommended that the contribution of different developers to supporting infrastructure should be apportioned on the basis of the impact created by each part of the development and that this approach should be reflected in the final SPD.
Phasing

6.91 The CYPLS noted that the draft SPD stated that the hospital use of the site is anticipated to terminate in 2009, but that this will not fit with the timetable for delivery of the school.

6.92 **Response/Recommendation:** This comment is noted and it is recommended that the timing of closure of existing uses is discussed further with Merton and Sutton Primary Care Trust and the final SPD amended accordingly if necessary.

Water Supply

6.93 Thames Water Utilities Ltd is the statutory sewerage and water undertaker for the Orchard Hill site. They were satisfied that the provision of utility infrastructure is considered in Section 5 of the draft SPD, and provided some information on lead times and requirements for water and drainage infrastructure.

6.94 **Response/Recommendation:** This comment is noted and it is recommended that no change should be made to the final SPD.

Planning Application

6.95 The CYPLS highlighted the issue of the planning application process, and the likelihood of two developers being involved if Option 1 of the draft SPD is developed.

6.96 **Response/Recommendation:** It is recommended that the final SPD should indicate that if more than one developer is involved in delivering the proposals, planning applications for different parts of the scheme would need to be co-ordinated, for example through obtaining an outline application for the whole site followed by two or more detailed consents, or through linked full applications.

6.97 S&M PCT ask for more certainty regarding the requirements for Environmental Impact Assessment (EIA).

6.98 **Response/Recommendation:** The Council has advised that an EIA would be required for Preferred Development Proposals, which includes the school, principally due to transport impacts, although an EIA would not be required for the purely residential option. It is recommended that this requirement should be incorporated into the final SPD.
QUEEN ELIZABETH FOUNDATION MOBILITY CENTRE

6.99 The Queen Elizabeth’s Foundation underlined the importance of retaining access to the Mobility Centre as set out in paragraph 2.4 of the draft SPD. In addition, the need for unlicensed disabled drivers to use the site roads was highlighted. The Foundation also expressed an interest in extending the dedicated area currently in their use to the south, possibly through purchase of additional land.

6.100 **Response/Recommendation:** The development of the site as envisaged by the draft SPD would provide a new network of streets, which would provide a range of routes suitable for practice by learner drivers. The requirements and aspirations of the Mobility Centre should be included in the final SPD, and should be accommodated in the redevelopment of the site as far as possible. However, it should be recognised that the use of the land to the south is less likely to be possible with Preferred Development Proposals as the school would need to utilise this land to accommodate its outdoor facilities.

DETAILS OF THE SPD

6.101 A number of respondents raised detailed issues related to text and figures within the draft SPD. In particular, both the CYPLS and S&MPCT noted that there is a need for consistency over references to the various site areas referred to in the document.

6.102 **Response/Recommendation:** It is recommended that amendments should be made in the final SPD as identified and the references to site areas should be made consistent.

6.103 CYPLS raised an issue in relation to differences in representation of the ridge line within the draft SPD.

6.104 **Response/Recommendation:** It is recommended that amendments should be made the final SPD to ensure the line is consistent on both plans and that at the eastern edge, the ridge line should align with the existing building line.

COMMENTS ON THE CONSULTATION PROCESS

6.105 A number of respondents stated that not all the consultation materials were clearly presented. Particular issues related to the lack of labelling of street names and the lack of a key on plans within the consultation leaflet. Some respondents felt that, due to the lack of options including health care facilities as promoted by QMCCF, the consultation exercise should be rewritten and a new consultation carried out.
6.106 **Response/Recommendation:** The Council has identified how it will consult the community within its Statement of Community Consultation. The different methods to be used are set out in Section 3 of Statement. The consultation has been carried out in accordance with Government Guidance and Regulations for preparing SPDs.
ANNEX A: LIST OF CONSULTEES

ANNEX B: CONSULTATION LEAFLET

APPENDIX C: QUEEN MARY’S CHRISTIAN CARE FOUNDATION CARD AND EXPLANATION LEAFLET

APPENDIX D: SCHEDULE OF CONSULTATION RESPONSES RECEIVED, RESPONSE AND RECOMMENDATIONS
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