

Planning Policy

From: Twaits, Abbie <
Sent: 31 August 2018 15:45
To: Planning Policy
Cc: Butler, Lynn
Subject: Issues and Options Consultation for Local Plan
Attachments: Test Valley Local Plan Issues and Options Consultation FINAL.DOCX

Good afternoon,

Thank you for the opportunity to consult on the Issues and Options paper. Please find attached a response from the Hampshire County Council Public Health team.

Kind Regards
Abbie

Abbie Twaits

Tel No:

Email:

Secure Email:

Contact number for Adult Services' Referrals and Enquiries
Contact number for Hampshire's Out of Hours Service

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**Public Health response to Test Valley Borough Council Issues and Options
Consultation for the next Local Plan (Aug 2018)**

Comments by:	Hampshire County Council Public Health
Date of Comments:	31 st August 2018
Correspondence to:	cc

Thank you for the opportunity to respond to this consultation. Below we have provided responses to specific consultation questions on which we possess specialist knowledge and/or that have evidenced links to Public Health. We invite and welcome further detailed discussion on any of the points below, and are happy to provide additional detail/evidence on request, or in support of the development of future local plan policy. Please contact your dedicated Public Health Liaison for Test Valley Borough Council, Abbie Twaits, in the first instance.

Q15: Should the council change its approach and set out a requirement that certain sites should provide for the needs of such groups as the elderly?

The latest iteration of the NPPF states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes). We recommend a needs assessment is carried out and that policy is developed and adopted accordingly.

Broadly speaking, for maximum health and wellbeing benefit, housing developments should meet a variety of identified and predicted housing needs through their design (e.g. Lifetime Homes, Nationally Described Space Standards, etc.) and designation (e.g. affordable). However, we feel strongly that diverse, inclusive communities are beneficial to residents and the wider community, therefore we would encourage policy that supports a wide housing mix within developments, as opposed to developments which cater only for a single population group (e.g. older people).

The development of Lifetime Homes can support the growth of housing stock that meets a range of needs, as they are designed to be easily adaptable for people as they age, or for those who have a physical disability.

We believe that policies for new housing schemes should not be limited to the household but should also consider urban design, such as active travel, wayfinding and connectivity to towns and other neighbourhoods. This can enable groups, such as older people, to stay connected to their community and support them to remain independent for longer.

Q16: Should we include a policy that requires a mix and type of housing, or should the housing market inform what mix and type of housing to build?

A policy that requires a mix and type of housing should be included in order to meet current and predicted need, especially related to older people. For example, there is a predicted 35.5% growth in proportion of people aged 85 and over by 2024. It is vital that the housing stock is available to accommodate the needs of older people to live safely and

independently. Like elsewhere in Hampshire, affordable housing is also key, especially for younger people and families.

We would recommend a presumption in favour of developments that include homes with more than one bedroom. Two+ bed homes allow for flexibility for healthy aging (e.g. provide space for carers) and provides space for families to live and remain in the borough.

The issues and options paper suggests the potential for economic growth which could mean a need for a range of family homes. We understand that there needs to be a balance based on the uncertainty of the future, however the current housing market may not reflect the level of need for housing if there is economic growth. Furthermore not supplying enough appropriate housing for families early enough could hinder economic growth as there may not be suitable places for growing professional families to live within the borough.

The current housing market also does not consider the needs of individuals who are not living in their own home, e.g. people with physical disabilities, whose needs are not met by the current housing stock and are therefore living in residential care settings.

The policy should include the socially rented sector in addition to a range of other affordable tenure types. All affordable homes should evenly distributed across development and be indistinguishable to market homes in design and appearance (i.e. "tenure blind").

We recommend conducting a needs analysis of the current and future housing market is carried out to ensure that a policy adequately reflects the needs of the borough's current and future residents, with the flexibility to cater for needs that are currently unknown. The policy can be linked to the approach taken to address question 15.

Q19: Do you think we should establish internal space standards for future homes?

We would strongly recommend the adoption of the nationally described space standards. Without the inclusion of adequate internal space standards, there is a risk of overcrowding, housing being non-adaptable homes for older people or being inaccessible for people using mobility aids. People need adequate space in their home to prepare food, study and carry out activities. Overcrowding and lack of space are associated with an increased risk of accidents, infectious diseases, condensation and mould¹ and have been linked to numerous negative health outcomes including respiratory illness and poor mental health².

Nationally described space standards should apply to all new homes, including affordable dwellings. This is especially important since, in the absence of nationally described space standards, market forces may mean that homes for private sale/rent are built with adequate internal space whilst affordable homes become smaller to the detriment of residents' health and wellbeing.

We would also like to see a standard that applies to private outdoor space, due to the associated benefits to health and wellbeing. For example, research tells us that children

¹ Office of the Deputy Prime Minister (2004). Housing Health and Safety Rating System: operating guidance.

²Chartered Institute of Environmental Health

living in homes with private gardens tend to have higher levels of physical activity than those who do not.

Q20: Do you think we should establish standards for accessible, adaptable and wheel chair user dwellings?

The development of lifetime homes can support the development of accessible and adaptable housing stock as they are designed to be easily adaptable for people as they age, or for those who have a physical disability. As such, this reduces the need for different types of dwellings as they should be designed to support people at all stages of life to live independently. All new homes should also conform to Part M standards. Therefore, there should not need to be specific housing for people using wheel chairs which results in more flexibility and choice for those to live where they would want to.

This should also include the design of the local area such as pavements, dropped curbs, crossings, parks and open spaces, etc. We recommend that insight is sought from people with physical disabilities through channels such as the local Physical Disability forum.

Q22: How do you think we should best meet Gypsy, Traveller and Travelling Showpeople's needs?

We would recommend that the borough refer to the Hampshire Consortium Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2016-2036 to understand the needs of the population and to plan for the future.

Gypsies and Travellers are known to experience poorer health outcomes. Information about the health and wellbeing of people from Gypsy, Traveller and Travelling Showpeople backgrounds can be found on the following webpage:

<http://www3.hants.gov.uk/equality/accessibility-of-services/gypsyandtravellerwellbeing.htm>.

It is important to ensure that the future local plan helps to meet these needs through supporting the wider determinants of health.

Q23: Do you think we should include a specific policy on health and wellbeing? What sort of issues do you think it should cover?

Yes, whilst it is likely that health and wellbeing will be reflected in other policies (such as those mentioned earlier in this document), spatial planning and design can greatly influence health and wellbeing therefore local plans should be explicit in their acknowledgement of this.

Guidance on spatial planning and health can be found at

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729727/spatial_planning_for_health.pdf

Being mentally and physically healthier can contribute to the local economy and society, such as through fewer sickness absence days and the ability to engage with the local community.

The policy should cover:

- *Ensuring the places people live enable healthy choices* - such as green space, recreation and active transport
- *Enhancing the food offer in local retail and commissioned services* - such as using licensing duties and restrictions on densities of particular retail uses.
- *Raising awareness & facilitating behaviour change*- through street design, wayfinding and provision of green space.
- *Maximising value from service commissioning and provision* - such as ensuring local facilities exist from which community services can operate
- *Linking initiatives to places and people* - such as protecting green spaces and community facilities, incorporating wayfinding for walking and cycling routes, appointing travel plan coordinators, etc.

Hampshire County Council Public Health would be very pleased to support TVBC in the detailed development of policy/policies on health and wellbeing. For example, policy relating to restricting the operation of food outlets that sell fatty or sugary foods on the high street and near to schools.

Q39: How can we improve design quality within the borough?

In order to improve design quality within the borough from a health and wellbeing perspective, design management principles and strategic priorities within the local plan could incorporate the following principles:

- Sustainable development
- Urban form - design and the public realm
- Housing and employment
- Inclusive environments for older people and those living with dementia and physical disabilities
- Community facilities
- Green infrastructure and play spaces/recreation
- Air quality, noise, light and water management
- Active travel
- Encouraging healthier food choices
- Healthy high streets

Whilst these principles support health and wellbeing, they will also support the creation of attractive, inclusive and high quality developments.

More guidance can be found at

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729727/spatial_planning_for_health.pdf

Guidance on creating healthy high streets can be found at

<https://www.gov.uk/government/publications/healthy-high-streets-good-place-making-in-an-urban-setting>

Q40: Should the local plan be specific on the type of open space to provide or should it take account of existing provision/ future requirements? and Q41: Should we continue to set a per dwelling or per hectare standard for recreational open space provision on residential developments? Or, should the Council require the provision

of recreational open space on residential developments to be based on the needs set out in the Playing Pitch Strategy?

The local plan should adopt policies relating to the provision of open space as part of any new development. For example, the following guidance in Table 1 from Fields in Trust³ could be used in order to determine whether additional formal open space is required and the type, size and location of open space to be provided.

Table 1: Fields in Trust recommended benchmark guidelines – formal outdoor space

Open space typology	QUANTITY GUIDELINE ¹ (hectares per 1,000 population)	WALKING GUIDELINE (walking distance: metres from dwellings)	QUALITY GUIDELINE
Playing pitches	1.20	1,200m	<ul style="list-style-type: none"> * Quality appropriate to the intended level of performance, designed to appropriate technical standards. * Located where they are of most value to the community to be served. * Sufficiently diverse recreational use for the whole community. * Appropriately landscaped. * Maintained safely and to the highest possible condition with available finance. * Positively managed taking account of the need for repair and replacement over time as necessary. * Provision of appropriate ancillary facilities and equipment. * Provision of footpaths. * Designed so as to be free of the fear of harm or crime. * Local authorities can set their own quality benchmark standards for playing pitches, taking into account the level of play, topography, necessary safety margins and optimal orientation². * Local authorities can set their own quality benchmark standards for play areas using the Children's Play Council's Quality Assessment Tool.
All outdoor sports	1.60	1,200m	
Equipped/designated play areas	0.25 See table 4 for recommended minimum sizes	LAPs - 100m LEAPs - 400m NEAPs - 1,000m	
Other outdoor provision (MUGAs and skateboard parks)	0.30	700m	

The following guidance in tables 2 from Fields in Trust³ could be used in order to determine whether there is a need for equipped play areas. Guidance from Fields in Trust³ displayed in table 3 could be used in order to determine whether additional informal open space is required and the type, size and location of open space to be provided.

³ <http://www.fieldsintrust.org/Upload/file/guidance/Guidance-for-Outdoor-Sport-and-Play-England-Apr18.pdf>

Table 2: Recommended Application of Quantity Benchmark Guidelines – Equipped/Designated Play Space

Scale of Development	Local Area for Play (LAP)	Locally Equipped Area for Play (LEAP)	Neighbourhood Equipped Area for Play (NEAP)	Multi-Use Games Area (MUGA)
5-10 dwellings	✓			
10-200 dwellings	✓	✓		Contribution
201-500 dwellings	✓	✓	Contribution	✓
501+ dwellings	✓	✓	✓	✓

Table 3: Fields in Trust Recommended Benchmark Guidelines – Informal Outdoor Space

Open Space Typology	QUANTITY GUIDELINE ^s (hectares per 1,000 population)	WALKING GUIDELINE (walking distance: metres from dwellings)	QUALITY GUIDELINE
Parks and Gardens	0.80	710m	<ul style="list-style-type: none"> * Parks to be of Green Flag status. * Appropriately landscaped. * Positive management. * Provision of footpaths. * Designed so as to be free of the fear of harm or crime.
Amenity Green Space	0.60	480m	
Natural and Semi-Natural	1.80	720m	

In addition to a policy which specifies type, size and location, a policy could also specify aspects relating to quality of open space, as described in the tables above. With regards to green space, there is evidence to suggest that quality plays an important role. The features within a green space are important to support associated physical and wellbeing outcomes and can be enhanced across the following domains:

- Perceived quality

Perceived quality is related to a variety of greenery types including trees, lawns, water and features that attract wildlife. Walking paths, signage and local services are also important. Variation in the number of perceivable landscapes provides a greater range of health and social benefits.

- Perceived Safety

Perceived safety is an important motivator for green space visits and utility. Perceived personal visibility (openness) and the visibility of nearby dwellings contribute to feelings of natural surveillance. Therefore, dense, isolated areas with low visibility of local human activity and a lack of lighting may be associated with reduced safety. Similarly, a lack of maintenance and signs of vandalism contribute to feelings of anti-social behaviour and lower utility. Access to green spaces by safe road crossings is important to encourage utility.

- Physical Activity

Access to larger, attractive green spaces is associated with more walking and recreational physical activity. Smaller green spaces may not be able to encourage physical activity. Local

access (preferably <500m) is important for the frequency of visits. Shade provided by tree cover, benches and paths support recreational walking. High-quality green spaces are important contributors to child physical activity as variations in vegetation and elevation encourage play and may affect cognitive and motor skill development. Sports facilities and playground amenities also contribute to child and adolescent physical activity.

- Social Cohesion

Views from home, perceived accessibility and perceived community usage of green spaces are related to social cohesion. This is enhanced by green space maintenance such as the absence of vandalism or litter. Green spaces provide areas for many types of social activities such as hosting local events, enjoyment of nature and sports activities. Attractive areas with a variety of maintained greenery types enhance a sense of place and natural heritage.

Hampshire County Council Public Health would be very pleased to support TVBC in the detailed development of policy/policies on green and open space and health and wellbeing.

Q44: How can the council promote more sustainable forms of transport such as walking, cycling and public transport?

Public Health England provides evidence reviews and case studies on what works for promoting active travel. For example, PHE's "[Working Together to Promote Active Travel: A briefing for local authorities](#)". Local strategy related to active travel also exists in the form of the [Hampshire County Council Walking Strategy](#) and [Hampshire County Council Cycling Strategy](#).

Evidence on links between walking and the physical environment provide some clear messages for planners. It suggests that people walk more in places with mixed land use (such as retail and housing), higher population densities and highly connected street layouts. These urban forms are associated with between 25% and 100% greater likelihood of walking.

The Manual for Streets changed the government's approach to the design and provision of residential and other streets. This includes a hierarchy of provision that puts walking and cycling at the top, and following its principles can help design places that encourage active travel.

More generally when considering new developments, how we design our neighbourhoods is key to promoting healthy travel habits, not least in terms of mixed use developments, where local facilities such as shops, GP practices, schools and other services are located are important in providing short trip distances amenable to routine walking and cycling.

Also important is 'filtered permeability' (road design that still allows through-access for walking and cycling, but removes it for motor traffic) to provide direct routes for these modes, which in turn encourages active travel.

The Public Health team and active travel team in Hampshire County Council can support with information and advice in the development of policy related to sustainable travel.

Q45: How do you think the Council should be making provision for parking within new development?

Adequate parking within new developments can help to ensure that pedestrian and cycle pathways remain safe to use and free from obstruction, by avoiding the need for cars to park on verges, curbs and pavements. This can be achieved via local plan policy that specifies the number of car parking spaces required as part of new developments.

In line with the NPPF, new developments should allow for the installation of electric car charging points. This should also be encouraged in town centre and other retail developments.

In addition to car parking, the local plan should also ensure that adequate cycle storage is provided within new development. We recommend a minimum of two cycle storage places per home (including for one bedroom units). This is in anticipation that one bedroom units may often be occupied by two people. Visitor cycle parking should also be available. Achieving this will support Question 44 ("How can the council promote more sustainable forms of transport such as walking, cycling and public transport").