

Planning Policy

From: Abigail O'Reilly
Sent: 14 September 2018 16:28
To: Planning Policy
Subject: Consultation reply
Attachments: SEPT2018 - TVBC - consultation reply - issues and options for next local plan.pdf

Dear Sir/Madam,

Please find attached our response to your consultation.

Please do let me know if you would like to discuss this further.

Kind regards,
Abby

Public Affairs Specialist
Simplyhealth
M:



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Test Valley Borough Council

Issues and Options Consultation for the Next Local Plan

Response from Simplyhealth

September 2018

Introduction

1. Since our creation in 1872, we have existed to help people get the healthcare they need when they need it. We do this by developing products and services to help customers manage their health; by recognising how we can meet unmet healthcare needs in the long term through our charitable activities; and by responding to public policy developments in the nation's health landscape to promote good, sustainable health outcomes for the many across local communities. We are the leading provider of health plans, dental payment plans and pet health plans, and we support individuals and health professionals directly as well as working with thousands of employers to help them support the health and wellbeing of their workforces. For further information, please visit:
2. Our history is rooted in supporting local communities and charitable giving continues to play a key role in helping us to fulfil our purpose. Each year, we donate 10% of our adjusted pre-tax profits to a range of local and national charitable causes to help satisfy unmet health and care needs, with our total national and local community investment amounting to £1.13m in 2017.
3. Our head office has been based in Andover since 1981. We promote the good health and wellbeing of the community through our charitable partnerships, and our colleagues are encouraged to support local projects and initiatives by making donations, fundraising and participating in volunteering activities. Having identified three areas where we can positively impact the local community, we are currently working with Unity, Andover Mind and Valley Leisure to reduce isolation of the elderly, widen access to youth mental health services and encourage physical activity amongst the elderly. We are funding Unity's social prescribing initiative in Andover with a view to ensuring patients are signposted to the most appropriate community support, alleviating pressures on local GP practices so they are able to help those patients most in need of medical advice and care.
4. With more than 700 colleagues working across three sites in Andover town centre (Hambleton House (Waterloo Court), Alan Child House (Borden Gates) and Anton House (Chantry Street)), we're committed to helping our hometown thrive and prosper. We recognise that the decisions we make today have a significant impact on the future sustainability of our business and the communities in which we operate. As such, we are committed to helping drive economic, social and environmental improvements, both in relation to our own operations and across Test Valley, to maximise the positive impact of our charitable activities and business operations and to ensure we are fit to meet the needs of our customers, now and in the future. As such, we are already contributing to conversations about the future of the town through our involvement with Andover Vision.
5. We welcome the opportunity to respond to this consultation and to contribute to the development of the next Local Plan for the borough. Our response concentrates on those questions we are best-placed to answer.

6. Our registered company address is: Simplyhealth, Hambleden House, Waterloo Court, Andover, SP10 1LQ. The main point of contact to discuss this response is our public affairs specialist, Abigail O'Reilly. She can be contacted at abigail.oreilly@simplyhealth.co.uk or on 0775 324 0674.

Consultation Questions

Vision and Objectives

Q1: What is good about living and/or working in Test Valley?

7. Test valley is well-positioned geographically and is near several cities, including Salisbury, Winchester and London, making it a good location for commuters to settle. Andover is just over one-hour's train journey from London Waterloo making it an affordable option for prospective homebuyers who cannot afford city prices.
8. At present, in Andover, there is a Post Office and several high-street bank branches still open in the town centre, as well as several cash points. A combination of technological developments and rising costs mean that these local amenities are fast disappearing from high streets across the country and expediting the decline and closure of local shops and small, independent retailers, to the detriment of local economies. Efforts should be made to ensure that these services are encouraged to stay in the long term as part of a strategy to encourage greater footfall in Andover town centre.
9. Test Valley is a predominantly rural area and encompasses green landscapes of natural beauty, making it a popular destination for those who enjoy the outdoors. As such, it is a pleasant location for recreational activities and there is currently no risk of over-crowding. The 2018 Air Quality Annual Status Report¹ indicates that air quality is improving in the borough, which is beneficial for both the health of residents and the environment.
10. Traffic control measures around Andover town centre mean that congestion is minimal during rush hours.

Q2: What could be improved about living and/or working in Test Valley?

11. The transport infrastructure in Andover needs improving to reduce the impact of fuel emissions on the local environment; to reduce the town's carbon footprint; and to encourage people to use more environmentally friendly modes of transport.
12. Many of our employees live locally (in SP10 or SP11) or in the surrounding villages. If cycle routes and amenities for cyclists (e.g. bike racks) were rolled out more widely across Andover this could be a legitimate, eco-friendly mode of transportation chosen by our employees who travel a short distance to work each day.
13. We also have an office in Winchester, meaning that many of our colleagues are required to travel between sites. However, as the journey between Andover and Winchester using public transport can be time-consuming, and does require train changes, many of our employees choose to travel between offices by car since this is the most efficient option for them. Consideration should be given to how to improve the reliability and effectiveness of Andover's local transport infrastructure and public transport services across the borough.

¹ 2018 Air Quality Annual Status Report (ASR), Test Valley Borough Council, June 2018. See: <https://www.testvalley.gov.uk/housingandenvironmentalhealth/environmentalprotection/air-quality>

to neighbouring cities and towns. This could encourage people to use public transport more frequently.

14. Focus must be placed on helping town centres to thrive and adapt to meet the changing needs of consumers. The Chantry Centre in Andover is in a state of decline and several units have been vacant for some time. This appears to be negatively impacting footfall through the centre, which will ultimately compromise the survival of existing retailers. The withdrawal of Marks & Spencer from the high street, meaning there is no large retailer selling a combination of clothing and luxury foot items at the top end of town, could discourage people from visiting Andover town centre, hitting those retailers who relied on passing trade. Bold steps must be taken to repurpose vacant sites to drive people to visit the town centre.
15. We are supporting the Business Improvement District (BID) in Andover. We believe it has the potential to help improve the vibrancy of the town centre, benefitting the local community and making Andover an increasingly appealing place to live and work.
16. A significant number of our employees travel into Andover town centre every working day and make use of local amenities (e.g. cafes, coffee shops). Focus should be placed on what could encourage them to stay after working hours – or to visit the town centre outside the working week - by making the town an attractive place to for people to socialise and enjoy recreational activities. Andover needs to be transformed into a vibrant local community, offering services that attract visitors living outside of the local area.
17. We are supportive of plans to develop a Cultural Quarter in Andover². This could increase the attractiveness of the area, improve local amenities and encourage other businesses to settle in the area, thereby helping to stimulate the local economy and creating job vacancies that could appeal to local talent.

Q3: What should the Local Plan aspirations be for the next 20 years?

18. The Local Plan aspirations for the next 20 years should include the following:
 - a. **Improving the local transport infrastructure:** to help promote the use of alternative modes of travelling (e.g. cycling, walking), reducing fuel emissions and encouraging residents to be more physically active.
 - b. **Improving local amenities and the vibrancy of town centres (e.g. Andover town centre):** this would include developing a bold strategy to encourage more people to visit their town centre (such as through increasing the availability of, and developing more, residential properties in the town centre).
 - c. **Improving local employment opportunities:** to encourage the growth and retention of talent within the borough and to stimulate the local economy.
 - d. **Promoting environmentally friendly initiatives/commitment to sustainability:** to reduce the borough's environmental impact.
 - e. **Healthy, connected communities:** the Council is well-positioned to promote physical activity as part of a preventative approach to healthcare, at the same time as driving improvements in the local environment that can be beneficial for the health and wellbeing of local people. Residents should be encouraged to make connections across the local community as part of a sustained effort to combat loneliness and social isolation and to foster a strong sense of community spirit.

²'Boost for Andover's 'Cultural Quarter', Test Valley Borough Council, 8th January 2018. See: <https://www.testvalley.gov.uk/news/2018/jan/boost-for-andover-s-cultural-quarter>

Living in Test Valley

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?

19. Given the over-65s is an age group projected to grow faster than any other age group in the borough, the Council should consider stipulating a requirement to provide for the needs of elderly people to ensure their housing needs are met in the long term.

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?

20. Flexibility should be embedded into the Council's approach to housing so that regular assessments can be made of the needs of local populations as areas develop and change. This would enable the specific needs of local areas to be identified and accommodated accordingly. As the Council tries to attract young people to stay within the borough to work and settle, it is likely more affordable housing will be needed. Affordable housing would also attract a younger demographic to the borough who, as part of a sustained strategy to increase footfall in the town centre, could potentially use local amenities and help boost local economies.

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

21. We agree that the Council should have a specific health and wellbeing policy following its recognition that planning decisions can affect people's health. The issues it covers should include:
 - a. **The ageing population:** The elderly population is reportedly growing across the country, with the number of over-85s in England expected to more than double by 2035³. As well as considering their housing needs in the future, the Council should also ensure that there are provisions made for community facilities that help to reduce social isolation.
 - b. **Loneliness:** This has been recognised by the Government as an issue that needs to be tackled across society to improve health and wellbeing outcomes, and a national strategy is currently being developed. Tackling loneliness and isolation is a common theme running throughout our local charitable activities. Consideration should be given to how the Council can work with local charitable and health services to most effectively reach those in most need of support. This is so that they can be signposted to the right assistance to make connections.
 - c. **Preventative healthcare:** The Council should consider any potential impact of their planning decisions on the ability of adults and children to make healthy choices and participate in healthy activities, including sporting activities, with a view to ensuring that these can be enjoyed locally. This would include ensuring that there are well-maintained, safe public pathways that can easily link the town centre to those areas within walking distance. The Council should also consider what measures it can take to encourage residents to make healthy choices, thereby promoting the good physical, oral and mental health of families in the long term. Where necessary, the Council should work with Hampshire County Council to ensure that the right support can be put in place.

Q24: Should some types of facilities and services be given more protection than others?

³ The Lancet Public Health Journal, 30th August 2018. See: [https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667\(18\)30118-X/fulltext?utm_campaign=lancet&utm_content=76545667&utm_medium=social&utm_source=twitter#seccesstitle10](https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667(18)30118-X/fulltext?utm_campaign=lancet&utm_content=76545667&utm_medium=social&utm_source=twitter#seccesstitle10)

22. Community centres, including day centres for the elderly, which are being used regularly should be given more protection as they provide a neutral space for residents to meet and can become hubs of local communities. Steps should be taken to ensure that those facilities and services that are being used frequently by members of the public are protected.

Q25: Should we continue to protect all existing community facilities and services?

23. Community centres and local groups can often be a lifeline for elderly people and those who feel isolated. We are currently funding Unity's social prescribing initiative in Andover, whereby several GP practices have access to a social prescriber who can refer patients to community and volunteer groups to assist with their health and wellbeing beyond medical intervention. Community centres can help to facilitate the continuation of these voluntary activities.
24. The Council should complete an assessment of all existing community facilities and services to determine the frequency and quality of their usage and if they are serving a social and meaningful community purpose. If they are a cause for concern, the Council should seek to engage with local stakeholders to determine if currently vacant facilities could be used more effectively to meet the needs of the community before considering if they could be developed and put to an alternative use.

Working in Test Valley

Q27: What are your views on promoting smaller workspaces within the Borough?

25. Promoting smaller workplaces within the borough could help to encourage local innovation and entrepreneurship. It could also help to foster a more diverse network of local businesses. Commercial landlords in the town centre should be encouraged to offer premises as flexible working spaces as part of a sustained strategy to encourage people into the town centre.

Q28: What provisions or controls should be made relating to people working from home?

26. The Council should engage regularly with local businesses to get a sense of the working patterns of employees across the borough. With home-working becoming increasingly popular, it may not be necessary to allocate large areas of land for the development of business offices. Developing residential sites in town centres will help to ensure footfall even if people are not travelling in for work.
27. As more people work from home, the Council should consider any implications for local transport usage and traffic across the borough.
28. Fast, reliable and consistent telecommunication networks are imperative for successful home-working arrangements. Some of our colleagues who live in Andover's neighbouring villages, and further afield, often experience difficulties when tried to use the internet. The Council should continue to work with Hampshire County Council to improve communication links and access to Superfast Broadband across Test Valley⁴.

Q29: Should the Council continue to encourage retail uses within primary frontages or should a more flexible approach be taken with a greater range of uses being allowed?

⁴ 'Superfast Broadband,' Test Valley Borough Council, 2nd May 2018. See: <https://www.testvalley.gov.uk/business/land/superfast-broadband>

29. The Council should continue to encourage retail use within primary frontages to help promote the visual attractiveness and appearance of the town. However, the needs and trends of the consumer need to be considered and so there should be flexibility, as appropriate, to ensure the approach taken maximises footfall in town centres.

Q30: How should we best continue seeking apprenticeships?

30. It is important that young people across the borough have the opportunity to develop their skills whilst in employment. To best continue to seek apprenticeships, the Council should work more closely with local businesses to help promote the potential benefits of hiring apprentices and to identify opportunities.
31. Working with local colleges and employers, the Council could help to facilitate the creation of a database of local apprenticeship opportunities alongside a campaign across the borough promoting the value they can add to businesses and the local economy in the long term.
32. Encouraging the growth of local business through local development could lead to increased opportunities for apprenticeships and to learn new skills.

Enjoying Test Valley

Q33: Should we continue to retain the principle of Local Gaps? Should we define specific boundaries or a more general policy which aims to avoid coalescence?

33. The principle of Local Gaps should be retained.

Q34: Should the Local Plan identify and designate Local Areas of Green Space or should this be undertaken via Neighbourhood Plans?

34. The commitment to identifying and designating local areas of green space should be enshrined and embedded into the new Local Plan as part of the Council's commitment to promoting environmental sustainability.

Q35: Should the next Local Plan continue to promote water efficiency from new developments?

35. The next Local Plan should continue to promote water efficiency from new developments to ensuring long-term sustainability.

Q36: Should we identify suitable sites for renewable energy, including onshore wind, in the Local Plan?

36. Yes, the Council should identify suitable sites for renewable energy as this could help to reduce greenhouse gas emissions, improve the local environment for the benefit of residents and promote environmental sustainability.
37. These sites should be identified through consultation with local businesses and the public to ensure there is consensus on where they are positioned and that they do not negatively impact the visual appearance of the borough in a way that would discourage visitors and tourism.

Q37: If so, which areas of the Borough would be appropriate and for which types of technology (e.g. wind turbines, solar photovoltaic panels)?

38. The areas of the Borough suitable as sites for renewable energy sources should be determined through consultation. As part of this, the type of technology most appropriate for each specific site can be identified, considering what could help drive efficiencies most effectively and be most visually pleasing.

Q38: Should the Local Plan encourage energy efficiency when constructing new development?

39. Yes, as this would help to reinforce the importance of working efficiently and could encourage good behaviours across the Borough by showing that the Council is leading by example through its own operations.

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?

40. The Local Plan should take account of future requirements.

Q42: Should alternative open space for mitigation be provided as part of new developments or should land be specifically allocated, or a combination?

41. Consideration should be given to a combination.

Infrastructure in Test Valley

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

42. We recently completed a survey of our colleagues and found that almost 15% are travelling less than one mile to work. 32.7% are travelling two to five miles, almost 11% are travelling six to ten miles and more than 25% are travelling 11 to 25 miles. At the other end of the spectrum, almost 16% are travelling 26 miles or more into work every day. With almost half of our colleagues who answered the survey living within five miles of our offices, there would be potential for alternative modes of transport to work to be explored, with cycling and walking potentially a feasible option for several people.
43. In response to the question about what would encourage them to choose an alternative form of transport at least one day per week, more than 23% of our colleagues claimed that there are no practical alternatives for their commute. 3% agreed "safety concerns" were the reason why they would not pursue an alternative form of transport, with poor reliability (21%) and infrequency of public transport (just over 24%) additional reasons highlighted.
44. The Local Plan should consider improving the network of safe walking and cycling routes across Test Valley, with attention paid to the development of high amenity routes which would connect key areas across the borough - and also link to parks, rail and other public transport services. There needs to be safe crossing points for pedestrians established on busy roads, and it must be ensured that crossing signals will enable walkers, cyclists and the elderly to easily cross frequently.
45. Cycling and walking should be promoted as leisure activities, and as a cost-effective way of improving individual health whilst also helping to reduce fuel emissions across the borough. The Council should consider - with Hampshire County Council - promoting cycling education programmes in local primary schools so that local children consider cycling a legitimate and attractive form of travelling, especially when travelling short distances. This could form a key part of a sustained promotional campaign.
46. Improvements in the frequency of public transport, and how this connects to neighbouring towns and cities, should be reviewed to make this a legitimate travel option for commuters.

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

47. The Council should consider offering car parking free in the town centre to encourage footfall.
48. Car sharing should be actively encouraged within the new development to mitigate the environmental impact of fuel emissions.
49. The Council should liaise with local businesses across Test Valley – especially those who may be based in the town centre or near to areas where there is high footfall – to determine if the car parking they have available could be used by the public free of charge outside of office hours.
50. EV charging points should be installed across the borough to encourage the use of electric vehicles.

Q46: Do you agree with the Council's current approach or are there changes you would like to see made?

51. To ensure the effectiveness of the Council's plan over the next twenty years, initiatives promoting environmental sustainability that help to drive social and economic improvements must be at its heart. Collaboration (including close working with Hampshire County Council) and engagement with local stakeholders will be key to ensuring the effectiveness of plans.

Conclusion

52. We would welcome the opportunity to discuss our response in further detail and we look forward to the next stage of this process.