

# HOOK PARISH COUNCIL



Executive Officer: Anne Atkins  
Hook Community Centre  
Ravenscroft  
Hook  
Hampshire  
RG27 9NN  
Tel: 01256 768687/573  
mailto: [eo@hook.gov.uk](mailto:eo@hook.gov.uk)

27<sup>th</sup> September 2018

Ms Helen Skinner  
The Planning Inspectorate  
Room 3/J  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Dear Ms Skinner,

**Ref: APP/N1730/W/18/3206951 – Land at Owens Farm**

**Appeal by Wilbur Developments Ltd, Site address Land at Owens Farm, Hook  
Hook Parish Council's Representations to the Inspector**

Hook Parish Council has resolved to object strongly to the Planning Application reference 17/02317/OUT on the following grounds:

- The Developer's proposals for the provision of safe and convenient facilities to enable pedestrians and cyclists to use these modes to connect from the Site to Hook Village Centre are totally inadequate.
- There are no credible proposals for the necessary road improvements between both the Site and Hook, and the Site and the A30 via Old School Road resulting in concerns for road safety.
- The Scheduled Bus provision is wholly reliant on subsidy and not sustainable. Hook already has a very large amount of committed residential developments which are currently being delivered (already providing for some 1454 additional dwellings or a 45% increase in housing without the 700 additional houses proposed at Owens Farm). A further 700 dwellings is not required at this time and not sustainable in terms of the existing social and economic infrastructure.
- The proposed development would totally infill the Gap between the Hook Village settlement boundary and the Newnham Parish boundary resulting in coalescence between the two settlements. The Parish Council's objections are minuted in the Planning and Infrastructure Committee meetings of 25<sup>th</sup> October 2017 and 11<sup>th</sup> April 2018.

Hook Parish Council have subsequently carefully considered the Appellant's Statement of Case (SoC), as submitted by Armstrong Rigg, Planning Consultants dated July 2018, and now inform that they fully maintain their objection to this application and request for the Appeal to be dismissed accordingly.

The further detailed reasons for the Parish Council's objections are provided in the following text and the **Parish Council wishes to reserve the right to speak at the Inquiry.**

## **Means of Access**

### **1 Pedestrians and Cyclists**

The Developer is only proposing to provide a footpath and possibly a cycle path between the Site and the existing settlement boundary across a field on the route of the existing PRoW 25 when it is provided with a hard surface, as shown on Plan 6 of the SoC. This route is an open grass field that is the subject of an earlier Rejected Planning Appeal, reference APP/N1730/A/14/2226609. The pedestrian route would have no natural surveillance, which is part of the 'security by design' principles. At the existing settlement boundary PRoW 25 becomes a narrow alleyway at the rear of gardens before joining the unmade and unclassified road known as Church Path. This route would only be suitable for a daytime leisure route for able pedestrians in summer months. Therefore, this route would be totally unsuitable for residents of all ages and abilities wishing to access the Hook Village Centre at all times of the day and night. The 1.5m width agreed by HCC in their letter of 30<sup>th</sup> May 2018 would be totally inadequate as a well-used footpath route to connect to the village centre.

Further, it is now proposed to be a shared use route to include cyclists which would suggest that a 3m width of surfacing should be provided as a minimum in accordance with the Sustrans Guidance for medium flows in their Handbook for Cycle Friendly Design. However, it is essential that any development at the Owens Farm Site is fully integrated with Hook Village by sustainable modes of travel. The only safe and commodious route for all pedestrians, including those less able, pushchairs and mobility scooter users, at all hours of day and night would be a continuous minimum 1.8m wide footway (albeit the current design standard is 2.00m wide for a new footway) alongside Newnham Road. Anything less would certainly seriously compromise the safety of residents. Indeed, a Planning Inspector has even refused permission elsewhere for a development where the road access did not have continuous footways as it was considered a disincentive to walk from the Site to the Village Centre (for this Site the distance from the proposed housing to the Centre of Hook is measured to be between 1.6 and 1.8km).

It would appear the Developer now proposes to only provide a 'Virtual Footway' (i.e. no Footway) on Old School Road where it crosses over the Railway Bridge (see Plan 4 of the Developer's SoC), and provide priority to the Newnham Road East/Old School Lane traffic at the nearby junction. The provision of a 1.8m wide kerbed and surfaced footway and single way working for vehicular traffic over this Railway Bridge is considered to be essential to ensure pedestrian safety. (It is noted that HCC have asked the Developer to agree an improvement option at this bridge to ensure pedestrian safety. They have also stated that any compromise in regard to vehicular and pedestrian access for this Site is not acceptable).

### **2 Road Safety**

The Developer appears to be relying on Plan 4 in the Statement of Case and this plan is of a very small scale and not at all clear in regard to whether the proposals are at all feasible at any particular location. Therefore, it has still not been satisfactorily demonstrated that Newnham Road and Old Station Road can be widened to the minimum 6.0m wide carriageway (required where there is the occasional use by buses and goods vehicles), plus a 1.8m wide continuous footway. An overall width of 7.8m (for both carriageway and footway) is the minimum requirement for safe passage of all classes of traffic including Scheduled and School Buses, Heavy Goods Vehicles, Cycles and Pedestrians (noted that HCC have raised this issue). However, the Scheduled Bus operator has in fact requested a 6.2m width of carriageway, that width being consistent with the highway design principles for Buses regularly passing other vehicles and that would require an overall width of 8m.

Currently the carriageway of Newnham Road east of the Site, between the Site and the A30, is only between 4.26 and 4.72m in some sections, and here the footpath is very narrow and alternates from side to side of the carriageway.

The proposed improvements at the Newnham Road/A30 London Road Junction include a proposal to widen the Newnham Road arm by approximately 4.8m on the western side by acquiring land from what is currently designated as Village Green (DG 168). However, such areas of land cannot be taken without the permission of the Secretary of State (SoS) based on evidence that the reduction in area would benefit the community. Such permission can take many years to obtain. It is clear that in this situation the basis of any proposal to acquire part of the Village Green would be commercial gain by a Developer so the SoS is unlikely to grant permission. Consequently, if the necessary additional area of land is not available then the proposed road widening would not be possible and that would invalidate the junction assessments which have been undertaken for this location.

The introduction of a 1.8m footway to the east and west of Carleton Close on the Northern side of Newnham Road in addition to the necessary road widening at this location would require some land which is designated as Common Land (CL4) and again cannot be taken without the SoS permission; this is not likely to be forthcoming as the basis is commercial gain by a Developer. Again, the proposed improvement here is not credible.

The proposal is to widen the carriageway to 5.m width (i.e. less than the 6m minimum or 6.2m desirable that is required) to the east of Newham Park but there is no provision here for a footway. The lack of any adequate provision for pedestrians would present serious safety concerns for existing properties as well as being totally inadequate for the Development related pedestrian trips. There is no consideration of safe cycle provision along Newnham Road to connect the Development to Hook Village Centre and the railway station.

**In summary**, there is no ability by the Developer to acquire the additional land that is essential to enable the Developer to carry out the necessary highway improvements, other than by negotiation with a willing seller, and to secure all the necessary consents that relate to the areas of Common Land and Village Green, where those designations apply, all as described above.

### 3 Traffic

Peter Brett Associate's Independent Assessment of the TA shows that the Developer's forecast of trip rates for the Development are low. The distribution was calculated using Census 2011 Journey to work data and it is apparent that the proportion of trips are understated towards Hook Village. The analysis does not recognise that the Railway Station (which will be a key attractor of car trips in peak periods) is between 1.8km and 2.0km distance from the proposed houses. However, the Developer does not predict any significant queuing to the east at the Newnham Road/A30 Junction provided double yellow lines are applied at the east end between Carleton Close and the A30. (It is noted that HCC have raised this car parking issue and independent surveys have shown that cars casually parking here cause conflicts as highlighted by HCC).

With regard to the Newnham Road/Old School Lane Junction and the crossing of the Railway Bridge, the Developer's actual proposals are confusing as in Plan 4 of the SoC it would appear that the Developer now proposes to maintain what is termed as a "virtual footway" (i.e. no footway), as opposed to the one-way traffic option proposed in his earlier documentation. This situation would be totally unacceptable having regard to the forecast increase of traffic, including all construction traffic for this site over a number of years. The independent traffic assessment carried out by PBA indicates that one-way working over this bridge would lead to minor traffic delays but the improved safety afforded by the provision of a kerbed footway would far outweigh any disbenefit to vehicular traffic.

However, the operator of the proposed Scheduled Bus Service 10 may object to this delay to his services. Also, any delay on this route may result in traffic from the Development being encouraged to 'rat-run' through Newnham and use the very narrow Crown Lane to access the A30.

#### **4 Buses**

The proposal for Bus Route 10 on Plan 7 of the Developer's SoC has much 'dead running' between Old Basing and the Site, which duplicates the Bus Route 13 over this length; therefore, it is not surprising that the extension to Bus route 10 is only viable with a full subsidy from the Developer. The proposed Bus Route 10 to the east of the Site does connect directly to the Village Centre, the Railway Station and Employment Areas, but does not benefit the other residents of Hook. The money identified for this heavily subsidised and contrived extension to a Schedule Bus Service, which currently serves Old Basing some 5 miles to the east, would be better spent on local community transport that could provide benefit to the whole of Hook. If the Bus Operator considers Old School Road and Newnham Road to be suitable for use by the proposed Route 10 services after the road is widened then Route 13 could just as easily divert down Old School Road and along Newnham Road thus serving the same direct provision of public transport from the site to Hook Village Centre and that would improve the fare income of Route 13 which is also currently subsidised.

However, the transport demand in this locality is for more demand responsive public transport so any Developer funding for public transport should be provided to Hook Parish Council to enable them to provide a community bus service that would serve not only the Site, but the whole of Hook.

#### **5 Network Rail Impacts**

There is no evidence that the Developer has entered into an 'Asset Protection Agreement' with Network Rail which, as stated in NR correspondence dated 02/11/2017, is necessary prior to commencing any Approval in Principle process for works which are in proximity to NR Assets. These would include the increased traffic impact on the NR Bridge 2/125 on Old School Road, the ground water issues alongside their deep cutting and the introduction of a roundabout on Newnham Road. The roundabout will present significant new risk to the Railway due to the travel direction of traffic on the roundabout. The measures required to afford the required level of protection to the Railway must be agreed with Network Rail before the Development is considered to be viable.

#### **Sustainability**

- a. The Developer's SoC and the Developer's TA, both contain evidence that the main vehicular access to the Site would be via Old School Lane. This, together with the proposed development extending right up to the Newnham Parish boundary, leads to the conclusion that the proposed development would have more integration/coalescence with Newnham Village than with Hook. Indeed, the Development would become rather isolated having a physical severance from the Hook settlement in the form of two grass fields and a lack of infrastructure to enable travel by sustainable modes into Hook Village.
- b. The Parish Council fully supports the designation of a Local Gap between Hook and Newnham in the draft Local Plan, and the separate submission by the Hook Neighbourhood Plan Steering Group. It is also noted that Newnham Parish Council strongly supports the designation of the Gap that is defined within the Hook Neighbourhood Plan.

- c. It is noted that HCC have also stated in their letter to the Developer that the development proposals “would result in the users of the development being unable to make use of sustainable transport opportunities” and “the significant movements generated could not be accommodated adequately on the existing transport network”. Both of these statements are fully supported by Hook PC.
- d. The Sustainability Appraisal of this Site, SHL 173, provided by Adams Hendry as part of the High Level Site Assessment for the Local Plan is mis-quoted in the Developers SoC (para 5.10) as it was identified that in response to Sustainability Appraisal Objective SA18, (i.e. To improve the transport networks by enhancing the proportion of travel by sustainable modes and promoting policies which reduce the need to travel), the appraisal resulted in a score of “Minor negative effect” which is far from being the best performing option as suggested by the Developer.
- e. The High-Level Assessment of this site, SHL 173, for the Local Plan noted that Newnham road is “a relatively narrow rural lane and is not considered suitable for providing access to a large development” and “the same may be the case for Old School Lane”. This statement is consistent with the Adams Hendry observation on SHL 173 that “the infrastructure deficits and access issues need to be overcome if this site is to be considered developable”. It is also stated that “properly addressing the infrastructure gaps and poor accessibility could affect the developable viability of this site”. It is reasonable to conclude that this situation could be the reason why the Developer is reluctant, or unable, to provide a package of mitigation and improvement for accessibility and integration that would satisfy both the HCC and the LPA.
- f. The suggestion that there will be a new primary school on this Site which would reduce the need to travel by car is not the current view of the HCC Education Dept given the recent major extension of the Primary School in the centre of Hook Village. The actual pupil numbers in the expanded Hook Primary and Junior Schools are currently lower than forecast and, due to spare capacity, the school has had to reduce the staffing levels accordingly. Although the current NE Hook Development is well under construction, and due to contribute significant number of young children shortly, these pupils will have moved on to more senior schools by the time that Owens Farm Development is producing reception age children.
- g. In the Environmental Statement it is accepted that this Site is in Zone 3 of Hart DC’s Parking Guidance and hence the number of parking spaces per dwelling would reflect a relatively high car usage for this site. Therefore, the forecasts of trip generation provided in the transport assessments are likely to be lower than those that will occur in reality due to the relatively isolated nature of this Site.
- h. The proposal to build only 48 houses on a field between the Owens Farm Site and the Hook Settlement Boundary was rejected by both Hart and the Planning Inspector (Ref APP/N1730/A/14/2226609) because of the need to maintain a Gap for amenity, landscape and recreational purposes between the settlements of Hook and Newnham. Hook PC strongly support the maintenance of this Gap and hence strongly support the separate representations made by the Hook Neighbourhood Plan Steering Group.

## Summary

Hook PC considers that, notwithstanding the statement in Chapter 16 of the Environment Statement, it is apparent that the residual impacts of the proposed Development would have a severe impact on both Road Safety and the Environment of this area.

In regards to Road Safety, if the Development is permitted then it is very likely that the improvements along Newnham Road and Old Station Road would not be carried out to a satisfactory and safe standard due to constraints which are not recognised by the Developer.

A severely compromised situation would result, having many road safety issues that would be exacerbated by the increase in traffic, including buses and heavy goods vehicles, using these rural roads.

In regards to the Environment, if the Development were to proceed then the damage caused by infilling the Gap between Hook and Newham would acutely impact both of these villages resulting in unwelcome coalescence, a significant loss of amenity and loss of good quality agricultural land.

Yours sincerely,

*Anne Atkins*

**Anne Atkins**  
**Executive Officer**