



Response to PBA's Transport Modelling Addendum

Application Reference: EHDC-25-0748-OUT

Development Proposal: Outline Planning Application for 160 dwellings. All matters reserved except access.

This statement has been prepared response to the applicant's recently published Addendum Modelling Technical Note (AMTN), prepared by Paul Basham Associates (July 2025).

While the AMTN seeks to address technical modelling issues raised by Hampshire County Council's Intelligent Transport Systems (ITS) team, it does not resolve the substantive concerns raised in HVAs original objection on highways grounds. In fact, the updated modelling reinforces our view that the development would result in unacceptable and severe cumulative impacts on the local highway network, contrary to Paragraph 116 of the National Planning Policy Framework (NPPF).

We submit the following additional points:

1. Junctions Operating at or Near Capacity

The updated modelling confirms that the London Road (North) arm of the London Road/Montecchio Way/Garstons Way junction would operate at 99.8% Degree of Saturation (DoS) in the AM peak with the development in place. This is effectively at capacity and leaves no margin for error, growth, or deviation from assumptions. Other arms of the junction also approach or exceed 90% DoS, indicating a fragile network highly vulnerable to congestion, delay, and safety risks.

2. Significant Queue Growth

The AMTN shows that the queue on London Road (North) would increase from 12.8 PCU to 19.6 PCU (approximately 117 metres), extending to number 39 London Road. This represents a 53% increase in queue length and would affect access to homes, the school, and emergency services during peak periods.

3. Modelling Still Based on Flawed Assumptions

The AMTN continues to rely on calculated rather than measured saturation flows (SATFLOWS), despite HCC's suggestion that measured flows could be obtained. Moreover, the modelling assumes a 26% reduction in car trips due to modal shift. HVA's own survey data shows that the applicant's trip generation and directional assumptions



are significantly underestimated. No sensitivity testing has been undertaken to assess the impact of more realistic trip rates.

4. No Assessment of Construction Traffic

The AMTN, like the original Transport Assessment, fails to assess the impact of construction traffic over the anticipated four-year build period. This is a serious omission given the constrained nature of Holybourne's road network and the likely disruption from heavy goods vehicles, deliveries, and site traffic.

5. No Additional Mitigation Proposed

Despite the modelling showing that the network is at or near capacity, no further mitigation measures are proposed. The previously suggested interventions (e.g. build-outs, 20mph zone) have already been shown to be inadequate and potentially harmful to the village's character and function.

6. Omission of Church Lane and Brockham Hill

The original Transport Assessment and the AMTN make no reference to Church Lane or Brockham Hill, which is a known route for entering and exiting Holybourne. This omission is significant, particularly given this route is used by local traffic and would be impacted by development-related trips or construction traffic.

7. Failure to Account for Future Growth in Alton and Holybourne

The modelling scenario labelled '2029 + Committed + Development' does not include any of the proposed allocations in the emerging East Hampshire Local Plan, including the strategic site at Neatham Down. The January 2024 Regulation 18 draft Local Plan indicates that Alton and Holybourne are expected to take a disproportionately large share of the district's housing growth. None of this is reflected in the applicant's modelling, which means the assessment likely underestimates future traffic volumes.

8. Implications of the New NPPF Housing Land Supply Formula

As of April 2024, the district can only demonstrate 2.7 years' supply, triggering the 'tilted balance'. However, approving this development outside the Local Plan process undermines the ability of EHDC and Hampshire County Council to plan infrastructure strategically. It risks piecemeal development that fails to account for cumulative impacts and could lock in suboptimal transport and access arrangements.

Conclusion

The updated modelling confirms that the proposed development would result in a material deterioration of highway conditions in Holybourne. The junctions are already



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under pressure and would be pushed to or beyond their operational limits. The modelling remains based on flawed assumptions and omits key impacts such as construction traffic and future growth. We therefore maintain that the development would result in:

- An unacceptable impact on highway safety; and
- Severe residual cumulative impacts on the road network.

Paragraph 116 of the NPPF therefore continues to direct refusal of the application.