



For and on behalf of
Boningale Developments Ltd

REBUTTAL PROOF OF EVIDENCE (HIGHWAYS) OF MISS ANNA MEER BA (Hons) CMILT

Appeal by Boningale Developments Ltd against the non-determination of Full Planning Permission for 70 dwellings on Land to the east of Tilstock Road, Tilstock, Shropshire

**APPEAL REFERENCE APP/L3245/W/25/3362414
LOCAL PLANNING AUTHORITY REFERENCE 24/04176/FUL**

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October 2025

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0.0 EXPERIENCE

- 0.1 My name is Anna Meer. I have a BA Honours Degree in Geography and am a Chartered Member of the Institute of Logistics and Transport (CMILT). I also hold the Road Safety Engineering (RoSPA) accreditation.
- 0.2 I am currently a Director working for DLP Planning Ltd, which is a national planning consultancy. More specifically, I work within the Transport & Infrastructure (T&I) team within DLP, which specialises in highways and transportation planning. I head up the T&I team across offices in both Sheffield and Nottingham, whilst also providing support to our T&I team in Bristol. I have worked as a Transport Planner for over 18 years at multi-disciplinary companies and highway consultancies. This has included undertaking work on behalf of both private and public sector clients on highways and transportation jobs across the UK.
- 0.3 The evidence I have prepared and provided for this appeal against the non-determination of Planning Permission for 70 dwellings on land East of Tilstock Road in Tilstock is true and has been prepared and is given in accordance with the guidance of my professional institution, and I confirm that the opinions expressed are my true and professional opinions.

Signed	
Name	Anna Meer BA (Hons) CMILT
Position	Director, DLP Planning Ltd
Date	3rd October 2025

1.0 INTRODUCTION

- 1.1 This Rebuttal relates to an appeal against Shropshire Council's (SC) non-determination of planning application (Planning Reference 24/04176/FUL), for 70 dwellings on land east of Tilstock Road in Tilstock. The proposals would allow for a vehicle access off Tilstock Road and a pedestrian access onto Tilstock Lane.
- 1.2 Specifically, this Rebuttal relates to the issues raised in the Proof of Evidence (PoE) submitted by Mr Christopher Mead (on behalf of Shropshire Council).
- 1.3 Within this Rebuttal, I have focused upon matters where I consider evidence and / or further clarification would assist the Planning Inspector. However, this does not mean that, where I do not comment on certain parts of the PoE submitted by Mr Mead, that I accept their comments on such matters.

2.0 WALKING

2.1 Paragraph 4.29 of Mr Mead's PoE states that the location of the bus stop is approximately 445 metres (m) from the site boundary. This is incorrect. As set out in the Transport Assessment (CD7.1) and my PoE, the centre of the site is 445m from the nearest bus stop. The furthest plot away from the bus stop is Plot 39 which is a 620m walk to the eastbound bus stop. This represents a circa eight minute walk time (5kph), compared to a 400m walk distance which would take circa five minutes. I do not deem an additional three minute journey time to be material.

2.2 I have sought to find additional examples of appeals and planning applications where walking distances to a bus stop beyond 400m were deemed acceptable. I set these out below:

- App CHE/16/00016/OUT Land West of Dunston Lane, Derbyshire (CD17.2). The scheme related to 200 dwellings. The nearest bus stop is between 540m and 970m depending on the location of individual plots. The bus service is less than hourly.
- APP/P1045/W/24/3337912 Land at Wyaston Road, Ashbourne (CD15.26). The appeal related to 87 dwellings and was allowed in June 2024. The majority of dwellings were beyond a 400m walking distance, with the furthest being 827m away from the nearest bus stop.
- App 23/02095/OUT Milfields Phase IV, Shropshire (CD17.3). The scheme gained consent in October 2024, with the closest bus stop being 580m from the centre of the site.
- Appeal Ref: APP/T2215/A/13/2203710 - Land south of Knockhall Road, Greenhithe (CD15.27). The Planning Inspector stated that:

"Whilst 400m may be a useful proxy for assessing the accessibility of a site, it should not be applied in an overly prescriptive manner. Regard should also be had to the character of the area...."

3.0 CYCLING

- 3.1 At Paragraph 4.9, Mr Mead states that it is “*reasonable to conclude*” that a major factor is the level of cycling along the B4576 Tilstock Road is owing to the lack of segregated / protected cycle facility.
- 3.2 I have seen no evidence obtained by Mr Mead in terms of travel surveys for him to make a conclusion regarding cyclists’ individual behaviour. The evidence I have provided in Paragraph 3.21 shows that the route along the B4576 Tilstock Road is indeed used by cyclists on a daily basis with no cyclist-related accidents recorded.
- 3.3 In Paragraph 4.12 of Mr Mead’s PoE, he refers to the second access being a pedestrian and cycle access. This is incorrect. As set out in Point 17 the Highways SoCG, the principle of this pedestrian access via PROW 0233/28/1 “*should not be a matter for consideration during the appeal.*”
- 3.4 Once again, in Paragraph 4.13 Mr Mead refers to the “proposed footway / cycleway” and that it is intended for adoption. This is incorrect. The internal route towards PROW 0233/28/1 is not intended for adoption. An adoption plan can form part of a suitably worded planning condition.

4.0 PUBLIC TRANSPORT

- 4.1 Para 6.12 of the PoE states that the frequency of bus services cannot be relied upon for the purpose of commuting or accessing shops. I disagree with this statement. Paragraph 3.32 of my PoE sets out how residents working in Manchester (by way of example) can catch a return train from Manchester Picadilly at 17:30, to then connect to a bus which arrives in Tilstock at 19:03.
- 4.2 It must also be noted at Table 10 within “Shropshire Council – Hierarchy of Settlements” document (CD 2.17), the settlement of Tilstock Scores ‘5’ in relation to ‘Public Transport Link’ and ‘5’ in relation to ‘Regular Service Offered During Peak Travel Times’. This represents the maximum score available in relation to public transport links.
- 4.3 The document goes on to state at Paragraph 5.25 that:
- “Good public transport links within a settlement provide a community with the opportunity to utilise public transport when travelling for work; leisure; and to gain access to services and facilities that are not available within the settlement itself. This is particularly true in situations where there is a regular service offered during peak travel times.”*
- 4.4 The findings of Mr Mead are therefore contradictory to this document in relation to public transport accessibility.

5.0 ACCESS ARRANGEMENT

- 5.1 Paragraph 5.7 of Mr Mead's PoE refers to sections of the B5476 Tilstock Road that require adoption. This is incorrect. The proposed access strategy utilises existing publicly maintained highway, and any land under control of the Appellant would remain under control of the Appellant.
- 5.2 A suitably worded planning condition could be imposed which would ensure that all obstructions exceeding 0.6 metres in height shall be cleared from the land within the visibility splays, as illustrated in Drawing Number SH5037-11PD-002 (CD7.11) and, thereafter, the visibility splays shall be kept free of obstructions exceeding 0.6m in height.

6.0 INTERNAL STREETS

- 6.1 Paragraph 5.17 of Mr Mead's PoE states that the proposed internal layout of the site would be unadoptable owing to risk and routine maintenance to be undertaken by the Local Highway Authority (LHA).
- 6.2 This is the first reference I have seen from the LHA that the roads would be unadoptable. No carriageway width requirements are provided within Shropshire Council 'SMART' guidance, and detailed swept path analysis work has been undertaken to show a refuse vehicle can adequately manoeuvre within the site without any kerb overrun. I therefore fail to see why they are not to adoptable standards.
- 6.3 Paragraph 5.18 of Mr Mead's PoE concedes the layout concern is not one of safety, yet at Paragraphs 5.19 and 5.20 states the proposals have not applied measures to reduce traffic speeds accordingly. This is inconsistent. Nevertheless, I disagree with this statement, insofar as sections of block paving and bends have indeed been provided along the shared surfaces as shown at CD 6.19 "Enclosures & Surfaces Plan" to reduce vehicle speeds. Paragraph 7.2.15 of Manual for Streets (CD2.13) states that:
- "Research for MfS has shown that block paving reduced traffic speeds by between 2.5 and 4.5mph...."*
- 6.4 At Paragraph 5.22 Mr Mead states that visibility splays within the site extend across private gardens. I do not deem this to represent a reason for refusal. A suitably worded planning condition could be imposed to ensure that only low-level planting at such locations is permitted, and that any obstruction does not exceed 0.6m in perpetuity.
- 6.5 At Paragraph 5.15, Mr Mead states that, in relation to a 15mph design speed, "*no such design speed can be appropriately applied.*" I disagree with this statement. Page 79 of Manual for Street (CD 2.13) states that a "maximum" design speed of 20mph should be applied to residential streets. This recognises that 20mph is a maximum, and that a lower design speed is inherently acceptable. Indeed, Paragraph 7.4.8 of MfS states that, for new streets, the design speed can be below the posted speed limit and that this should include traffic calming measures (which the proposed scheme does offer in the form of block paving).
- 6.6 I have also sought to find evidence of a similar scheme within Shropshire, whereby Shropshire Council have accepted the principle of 15mph design speeds being acceptable

on some shared surface bends. As part of planning application 23/02095/OUT which was consented in October 2024 (CD17.3), Drawing Number SH5013PD-003 Rev C showed short sections of 15mph design speeds and associated 17m visibility splays. Whilst the scheme was outline in nature, layout matters were included in the application for the first 12 months of the scheme - with SC Highways providing detailed comments in relation to the internal layout throughout this consultation period. Whilst layout matters were removed in April 2024, no concern was raised within SC highways consultation comments to this date in relation to 15mph design speed at bends. I therefore find there to be inconsistency in terms of acceptance of such layout.

7.0 PARKING

- 7.1 At Paragraph 5.28 of Mr Mead PoE refers to Parking Plan P24-1425_DE_002_B_07. The correct Parking Plan is Drawing Reference P24-1425_DE_002_D_07 (CD6.17).
- 7.2 Paragraph 5.32 of the PoE goes on to state that the proposed parking levels represent an over-provision. However, as agreed in the Highways SoCG, Shropshire Council have no local parking standards.
- 7.3 The proposed level of parking provided is to prevent overspill and / or indiscriminate parking on the local highway.

8.0 REFUSE COLLECTION

- 8.1 At Paragraphs 5.36 to 5.37, Mr Mead raises concern in relation to the swept path analysis of a refuse vehicle accessing the site and manoeuvring within it. However, it is important to note that the geometric parameters of the site access were agreed between both parties at Point 4 of the Highways SoCG. Furthermore, no concern was raised with Drawing Number SH5037-10PD-003 Rev B, which was included in the Transport Statement (CD7.1) and showed the swept path analysis of the site access.
- 8.2 As part of the consented Millfields scheme in Shropshire (planning reference 23/02095/OUT), the same geometric principles were agreed as part of the site access strategy, whereby a refuse vehicle overran the centreline of the internal access road. Given this strategy was deemed acceptable in 2024, I would question why it is no longer deemed acceptable.

9.0 MOVEMENT HIERARCHY

9.1 At Paragraph 5.49, Mr Mead refers to “*wide carriageways*” and “*shared areas*” where vehicles are dominant. I disagree with this conclusion drawn by Mr Mead. The provision of shared surfaces are accepted within the council’s SMART guidance. Furthermore, as set out in Paragraph 3.48 of my PoE, shared surfaces are described in Manual for Streets guidance as having safety benefits.

9.2 I disagree with Mr Mead’s conclusions at Paragraph 5.57 where he states the layout provides a dominance for private car movements. Paragraph 11 of the SMART guidance states that:

“This hierarchy is not meant to be rigidly applied and does not necessarily mean that it is always more important to provide for pedestrians and cyclists than it is for the other modes. However, their needs should at least be considered first....”

9.3 I maintain my position that the needs of pedestrians have been considered first and that the layout has been developed in a balanced way.

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