



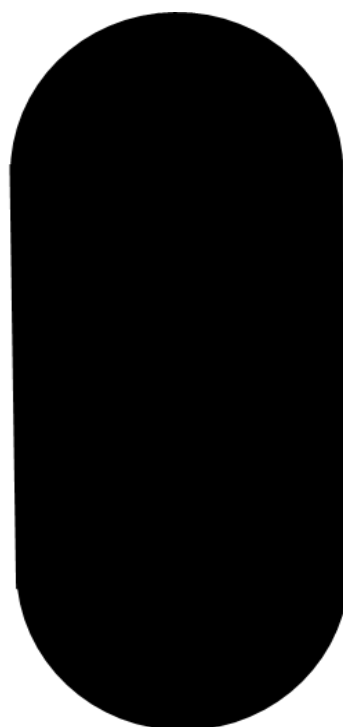
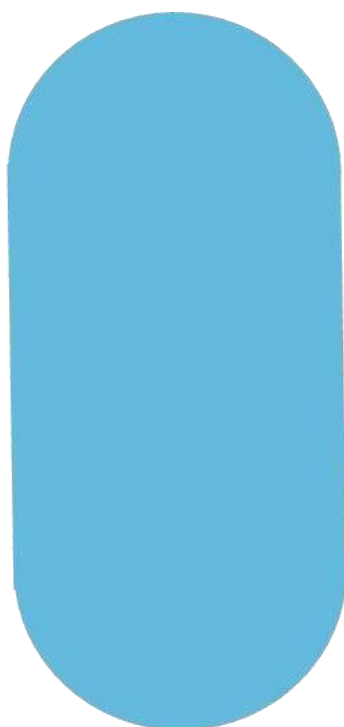
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**Rebuttal Proof of Evidence (Highways) of Miss Anna Meer
BA (Hons) CMILT**

**Appeal by Boningale Developments Ltd against the refusal
of Shropshire Council to grant permission for up to 800
dwellings, a care home, secondary school and local centre**

**Land at Patshull Road, Albrighton, Shropshire WV7 3BH
LPA Reference: 24/02108/OUT**

August 2026



Contents

0. EXPERIENCE 1

1. INTRODUCTION & BACKGROUND..... 2

2. WALKING ACCESSIBILITY..... 3

3. JOURNEYS BY CYCLE..... 5

4. PUBLIC TRANSPORT 7

0. EXPERIENCE

- 0.0 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.
- 0.1 I am a Transport Director working for Marrons, which is a national multi-disciplinary planning consultancy. I head up the Transport Planning Team at Marrons which provides support to Marrons offices across the UK. I have worked in the private sector as a Transport Planner for over 20 years. This has included undertaking work on behalf of both private and public sector clients on highways and transportation jobs across the UK.
- 0.2 The evidence I have prepared and provided for this appeal against the refusal of Planning Permission Application Reference 24/02108/OUT for 800 dwellings / 80-unit care home / secondary school / local centre on land off Patshull Road in Albrighton is true and is given in accordance with the guidance of my professional institution. I confirm that the opinions expressed are my true and professional opinions.

Signed	
Name	Anna Meer BA (Hons) CMILT
Position	Director, Marrons
Date	28 th August 2026

1. INTRODUCTION & BACKGROUND

- 1.0 This Rebuttal relates to an appeal against Shropshire Council refusal of planning application (Planning Reference 24/02108/OUT), for 800 dwellings and associated land uses on land off Patshull Road, in Albrighton. The proposals would allow for a spine road to be provided through the site connecting to Cross Road in the north and to the A464 Holyhead Road in the southwest and southeast.
- 1.1 Specifically, this Rebuttal relates to issues raised in the Proof of Evidence (PoE) submitted by Mr John Russell on behalf of Albrighton Development Action Group.
- 1.2 Within this rebuttal I have focused upon matters where I consider evidence 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 John Russell, that I accept his evidence on such matters.

2. WALKING ACCESSIBILITY

- 2.1. Within Section 2 of Mr Russell's PoE, he makes reference at Paragraph 2.7 to the "National Design Guide". I would reiterate that the National Design Guide itself describes 800 metres as a "general consideration" not a refusal threshold. Indeed, Mr Russell himself goes on to acknowledge that the quality and attractiveness of the route is equally as important as distance.
- 2.2. The above is reiterated by Mr Russell's reference at Paragraph 3.2 to the CIHT 2000 Walking Guidance and at Paragraph 3.6 the CIHT 215 Planning for Walking Guidance. Both of these documents are guidance as opposed to policy.
- 2.3. At Paragraph 3.14 Mr Russell describes how the appeal site is roughly triangular in shape and that consequently:

"... the majority of residential development is likely to be concentrated towards the southern part of the appeal site ..."

- 2.4. Given the application is Outline in nature, I would question how such a conclusion can be drawn at this stage in relation to the proportion of future residents that can be expected to walk particular distances from their respective plot towards Albrighton village.
- 2.5. Mr Russell goes on to state at Paragraph 3.18 that there are no facilities or amenities in reasonable walking distance based upon the aforementioned guidance. He then goes on to identify what he describes as "mitigation" to address the lack of accessibility.
- 2.6. This opinion of Mr Russell's is purely that. He repeatedly describes the distances to existing facilities, and within his own evidence, accepts that the proposed school and local centre would put such facilities within a walkable distance for future residents.
- 2.7. The provision of a secondary school and local centre is not "mitigation". The proposal for a mixed use development at this location is borne out of the Vision-Led approach as set out in Policy TR1 of the new National planning Policy Framework (August 2026). The provision of such facilities is not a reaction / mitigation to address initial concerns of either the Local Planning Authority or Local Highway Authority.
- 2.8. At Paragraph 3.21 Mr Russell continues that there is no commitment to providing the secondary school, local centre, GP surgery or supermarket and that the Appellant is not in a position to guarantee the timing or provision of such facilities.
- 2.9. This is a recurring theme throughout Mr Russell's PoE, in terms of facilities and services (including the proposed Bus Strategy) as not being secured and thus uncertain. I fundamentally

disagree with this suggestion. The phrase of “not secured” is very different to “cannot be secured”.

- 2.10. I understand that at the time of preparing this Rebuttal, the S106 Agreement is currently being drafted. This includes reference to securing the above facilities, and the stage of development / threshold at which they will be implemented. Indeed, the Phasing Plan (CD 6.7) also submitted as part of this appeal identified that Phase One will comprise the local centre.
- 2.11. At Paragraph 3.25 Mr Russell discusses how the proposed secondary school would attract users from outside of the proposed development site. Paragraph 5.16 of the Transport Assessment (CD7.01) sets out how the proposed 800 dwellings would account for 152 pupils of the 750 pupil school capacity. Thus 80% of pupils would be from outside the site. Tabel 4 of TN01 (CD7.08) sets out how utilising TRICS data, that 32.2% of all future trips to the school would be via foot, which would be the equivalent of 563 walking trips to the school. Based upon this calculation, 450 walking trips would be generated from outside the site, with 113 being internal.
- 2.12. The principal of multi-modal trip calculation and internalisation factors to reach the above conclusions have previously been agreed with the LHA as set out in Point 6 of the Highways SoCG.

3. JOURNEYS BY CYCLE

3.1. At Paragraph 4.2, Mr Russell refers to the Local Transport Note 1/20 (LTN 1/20) being the government's current guidance on designing cyclist infrastructure and is in accordance with the Government's "Gear Change: A bold vision for cycling and walking" (July 2020) policy document (CD7.25).

3.2. Within his PoE, Mr Russell fails to address the fact that the above policy recognises at Page 33 of the document that cycle infrastructure is not a "one size fits all" approach with the final paragraph on that page stating:

"This policy, and the standards, recognise that different levels of provision may be appropriate in different places, both within and between local authorities. For instance, in a shire county, the busy, densely-populated county town may be a higher priority for cycling intervention than a small village. We will require more from all local authorities, urban or rural. But our main focus will be on medium-sized towns, larger towns and cities"

3.3. As set out in my PoE and as agreed with ATE, I maintain that the level of cycle infrastructure is suitable in relation to the scale and location of development.

3.4. At Paragraph 4.12 of Mr Russell's PoE, I am not clear how he has calculated a forecast increase of approximately 5,388 additional vehicle movements over a 12 hour period (or indeed that 2,640 of these would travel through Albrighton village).

3.5. Based upon the traffic distribution and assignment as agreed with the LHA (Point 7 of the Highways SoCG), this allowed for 22% of residential / retail / employment and care facility traffic to travel towards Albrighton village, and 55% of secondary school related vehicle trips. Applying the TRICS daily output data for each land use and the agreed distribution, this equated to circa 1,183 vehicle trips through Albrighton during a 24-hour period. Of these 1,183 daily vehicle trips, 995 would utilise High Street (north), 54 trips would utilise Station Road and 134 along High Street (south).

3.6. Mr Russell then uses his proposed "2,640 vehicle movements" calculation and applies it to a supposed "threshold" of 2,500 vehicles per day as set out at Paragraph 7.1.1 of LTN 1/20, to conclude that conditions would exclude most potential cyclists from choosing to cycle to Albrighton village (i.e. cyclists mixed with traffic in the carriageway). Furthermore, at Paragraph 4.21 he states that most people would be excluded from cycling and / or have safety concerns.

3.7. Firstly, I would question why Mr Russell has not conducted his own traffic count surveys to establish baseline data as set out in Paragraph 4.17 - 4.18 of his own proof. If he is seeking to

“estimate” the existing level of traffic along Cross Road and High Street, I see no evidence or raw survey data before me as to where his calculations have been derived.

- 3.8. Notwithstanding the above, Mr Russell himself accepts at Paragraph 4.13 of his PoE that the 2,500 threshold is a “desirable” upper limit. Exceeding this is not identified as being a safety concern. Indeed LTN 1/20 does not set out anywhere that every road above 2,500 vehicles per day (without segregation) is unsafe.
- 3.9. At Paragraphs 4.22 to 4.88, Mr Russell proceeds to summarise the proposed cycle infrastructure that would be included as part of the proposed development. His description is incorrect when he discusses provision only being available on the western edge of Cross Road. As shown in Drawing 2530067.61.002 (CD7.19), the 3 metres wide shared provision is continued along the eastern edge of the spine road onto Cross Road, where a parallel crossing is then provided to the east of the Patshull Road / Cross Road / Elm Road junction to allow cyclists and pedestrians to cross to the northern side of Cross Road. Cyclists heading towards the village would then rejoin the carriageway to the west of the Cross Road / Albert Road junction.
- 3.10. Mr Russell sets out at Paragraph 4.28 that the proposed cycle infrastructure has:
- “... neither been properly assessed or secured.”*
- 3.11. The above statement is incorrect. The proposed mitigation has been the subject of an independent Stage 1 Road Safety Audit, with any amendments to the design already addressed. The most recent consultation comments received from ATE on 6th December 2024 recommended conditional approval subject to conditions and / or obligations. Since this date no further requests have been received from the LHA in terms of additional cycle infrastructure requirements through Albrighton. Indeed, the LHA recommended approval on 28th May 2025, with no requirement to undertake a further assessment of the proposed cycle infrastructure, stating *“no further action required at this time”*.
- 3.12. I have seen no evidence provided by Mr Russell stating how the proposed level of cycle provision conflicts with any national or local policy. I maintain that a 4 – 6 minute cycle journey along a direct and well lit route to the rail station, with low traffic speeds (by way of introduction of speed cushions along the entirety of Cross Road), provides an excellent opportunity to encourage cycle journeys.
- 3.13. I deem that the proposed infrastructure can adequately be secured via a suitably worded planning condition and therefore disagree with Mr Russell when he says these are not secured.
- 3.14. Therefore, my position as set out in my PoE remains unchanged.

4. PUBLIC TRANSPORT

- 4.1. Section 5 of Mr Russell's PoE considers public transport provision. With reference to accessibility, Mr Russell cites Transport for London's Passenger Transport Accessibility Level (PTAL) metric. He states that a walk of up to 640 metres to a bus stop is reasonable and 960 metres to a railway station.
- 4.2. Firstly, I would question the relevance of referring to Transport for London metric. The PTAL rating is explicitly a London-specific measure. Transport for London itself describes PTAL as a measure of public transport connectivity developed for London. I would question where in Shropshire Local Policy or Guidance, it is stated that the use of TfL PTAL methodology is suitable for assessing accessibility.
- 4.3. Once again Mr Russell makes no allowance for the proposed Bus Strategy that would be provided as part of any appeal allowed. The proposed bus stops within the site would be well within a reasonable walking distance for all future residents.
- 4.4. At Paragraph 5.12 Mr Russell refers to the proposed Bus Strategy as being "aspirational" rather than committed. I would draw the Inspector's attention to Appendix AM.7 of my own POE where I provided evidence of a similar Bus Strategy being secured via S106 contribution. I therefore see no reason why the same principle should not be acceptable in this instance.
- 4.5. In relation to rail travel, I note that Mr Russell has sourced data from network Rail in relation to reliability of services from Albrighton Rail Station. He states that 34% of services were recorded as being "late". It is however important to understand that Network Rail define a late departure as one minute or more against the timetable. I do not consider a service as being 1 minute (or even a few minutes) late as being materially unreliable.
- 4.6. I have seen no evidence before me in relation to the average length of such train delays, or any local resident questionnaire surveys to determine whether they view the service as being unattractive or unreliable.
- 4.7. Conversely, I have reviewed the data contained at www.railwaydata.co.uk to determine the attractiveness of Albrighton Rail Station. The website has been functional since 2012 and includes passenger data provided by Network Rails Strategic Rail Analysis Model and is licenced under the Open Government Licence. The website is also informed by the Office of Rail And Road portal data. The key highlights I have extracted are as follows (one-way to the destination) for the period 2024 / 2025, noting Albrighton Rail Station had 92,196 entries and exits which is an average of 253 passengers per day

- Top journey destination Birmingham New Street (12,954 journeys per year)
- Second top destination is Shrewsbury (7,366 journeys per year)
- Third destination is Wolverhampton (6,300 journeys per year)
- Fourth destination is Telford Central (2,615 journeys per year)

- 4.8. The above therefore shows that Albrighton Rail Station is indeed used by existing local residents, despite his assertions that there are limited services and poor punctuality.
- 4.9. Mr Russell states at Paragraph 5.28 that the proposals make no allowance for a bus service to connect to Albrighton Railway Station. This is incorrect. As shown at Appendix AM.5 of my PoE, the proposed bus interim shuttle bus would link directly to the train station, and so too would the subsequent public bus service.
- 4.10. I have seen no evidence from Mr Russell regarding what proportion of residents he determines would use the rail service, in order for him to conclude that the site is not well connected to public transport.
- 4.11. The contention that additional on-street parking would occur in the vicinity of the Albrighton Rail Station as a result of the development is unfounded. This is especially given the fact Mr Russell has made no allowance for future residents having a bus link directly to the station.
- 4.12. In terms of highway safety, Mr Russell states that placing pressure on the surrounding streets by increasing on-street parking around the station has implication for highway safety. However, the Personal Injury Accident data analysis undertaken as part of the Transport Assessment shows there have been no accident clusters in the vicinity of the station within the study period. Indeed, at Point 18 of the Highways SoCG (CD4.2), it is agreed that there are no material safety concerns within the agreed study area.



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