



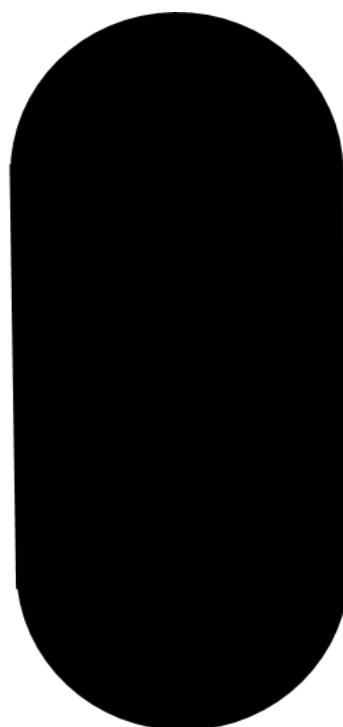
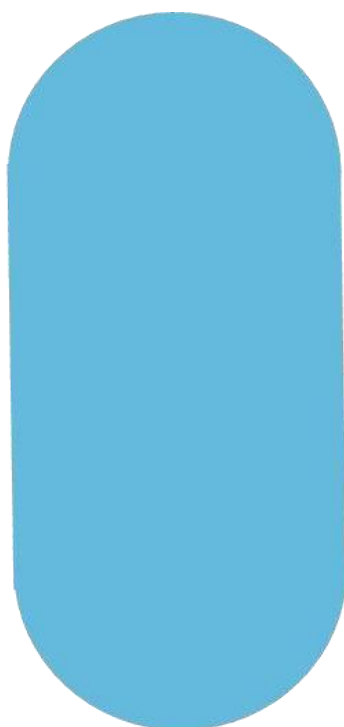
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**Proof of Evidence (Highways) of Miss Anna Meer BA (Hons)
CMILT**

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
PINS Reference:

August 2026



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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	7 th August 2026

1. INTRODUCTION & BACKGROUND

- 1.0 This Proof of Evidence (PoE) 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 There are no highways related reasons for refusal, with no objection to the scheme from the Local Highway Authority. The purpose of this Highways Proof of Evidence is to therefore address 'Main Issue 5' of the Inspector's Post-CMC Note. This relates to:
"whether future occupants of the proposed development would have adequate access to a range of facilities and services".
- 1.2 As part of the planning application, a Transport Assessment (CD7.1) and Travel Plan (CD7.5) was prepared by the Sustainable Development & Delivery (SDD) team at DLP Planning Ltd, dated May 2024. It is important to note that during this period I was Director of Highways & Transport at DLP Planning Ltd prior to joining Marrons, and thus I have been involved in the project since inception. The Transport Assessment concluded that the development would not lead to an unacceptable impact on highway safety nor a severe residual cumulative impact on the surrounding highway network.
- 1.3 The planning application was validated on 8th July 2024.
- 1.4 The below sets out the consultation undertaken from a highways and transport perspective.

Shropshire Council - Local Highway Authority

- 1.5 Initial consultation comments were received from Shropshire Council (dated 9th January 2024) which provided no feedback on the Highways Pre-Application Scoping Note prepared by DLP Planning in relation to future methodologies for assessment. We were unable to engage with the Local Highway Authority any further in terms of the level of assessment they were seeking as part of the subsequent planning application.
- 1.6 Following submission of the planning application, consultation comments were received from Shropshire Council as the Local Highway Authority (LHA) on 15th October 2024, which set out

agreed matters from the Transport Assessment and also identified matters that required further detail. The further detail was requested in terms of internal layout, additional capacity assessments and potential timing / phasing of the development.

- 1.7 In order to address the comments raised by the LHA on 15th October 2024, Technical Note 04 (CD7.10) was prepared by the SDD team at DLP Planning Ltd in December 2024. This TN04 included a revised set of residential TRICS based trip generation figures and 11 additional capacity junction assessments that were undertaken for a Future Year up to 2034.
- 1.8 TN04 also included a Stage 1 Road Safety Audit (and associated Designers Response) along with the updated package of proposed site access strategy and off-site highway improvement drawings.
- 1.9 A response was received from the LHA on 28th February 2025 stating that:

“... a formal objection is not being raised.”

However further information was requested in terms of a phasing plan for the development, and details in relation to planning conditions or S106 highway, passenger transport and travel plan contributions. The LHA stated that should the application be put forward for approval, further consultation would be required in relation to planning conditions and contributions attached to permission granted. A phasing Plan was also included at Appendix D of TNO1 (CD7.8).

- 1.10 A Highways Statement of Common Ground was signed by both parties on 10th July 2026 (CD4.2). Within this it was agreed that details in relation to suitably worded planning conditions and S106 contributions in relation to transport should be agreed prior to commencement of the Public Inquiry. Detail of the HSoG are contained at Section 3 of my Proof.

Staffordshire County Council – Neighbouring Highway Authority

- 1.11 Consultation was also undertaken with the neighbouring Highway Authority – Staffordshire County Council (SCC), with a view to assessing the impact on the highway network under the jurisdiction of SCC. As part of SCC initial consultation comments dated 6th August 2024, it was recommended that the application be refused based upon no assessment being undertaken of the A41 / A464 junction or the A41 corridor towards Wolverhampton. Concern was also raised in relation to the proposed development impact on the A41 / Heath House

Lane / Wrottesley Park Road junction.

- 1.12 In order to address the comments raised by SCC on 6th August 2024, Technical Note 05 was prepared by the SDD team at DLP Planning Ltd in December 2024. This included capacity assessment modelling works of the A41 / A464 and A41 / Heath House Lane / Wrottesley Park Road junctions as requested.
- 1.13 Subsequent discussions were then held with SCC, with Technical Note 07 then being produced by the SDD team at DLP Planning Ltd in May 2025 which summarised discussions held with SCC and concluded that an agreed position had been reached between both parties.
- 1.14 On 10th June 2025, SCC recommended conditional approval of the application (CD17.2), subject to a suitably worded planning condition relating to off-site highway works on the highway network under the jurisdiction of SCC.
- 1.15 A Highways SoCG (CD4.14) was signed by both parties on 3rd July 2026, with no matters of dispute.

Active Travel England

- 1.16 Consultation was also undertaken with Active Travel England (ATE) as they are a statutory consultee where the development exceeds 150 dwellings. Comments were received from ATE on 29th July 2024, on 4th November 2024 and on 6th December 2024.
- 1.17 Having reviewed information provided by the SDD team at DLP Planning Ltd in October 2024 and November 2024 (in the form of Technical Note 01 and Technical Note 03 respectively), ATE recommended Conditional Approval on 6th December 2024 (CD17.2)

Rule 6 Party

- 1.18 A number of objections were also received from the Albrighton Village Action Group (AVAG) in August 2024. These matters raised by AVAG were addressed in the formal response to AVAG in December 2024 (CD15.5).
- 1.19 Subsequently AVAG renamed their group as Albrighton Development Action Group (ADAG) in 2025, and are now participating in the appeal as a Rule 6 Party. The Statement of Case

prepared on behalf of ADAG (CD3.3) stated that the key issues in relation to transport were as follows:

- The proposed development does not meet the requirements of Paragraph 110 and 115 of the NPPF in relation to a 'genuine' choice of transport modes being offered.
- The scheme does not meet the requirements of the National Design Guide (2021), 'Planning for Walking' published by the Chartered Institution of Highways and Transportation ("CIHT Walking Guidance"), April 2015, the provisions of LTN1/20 or the (CIHT) 'Guidelines for Providing Journeys on Foot' (2000).
- Current connectivity by sustainable modes is relatively low.
- Current connectivity for car drivers is comparatively high.

1.20 Noting the issues above relate to sustainable travel, a dedicated Accessibility SoCG (CD4.13) was requested by the Planning Inspector and was signed between the appellant, Shropshire Council and ADAG on 23rd July 2026. Further details in relation to the above are contained at Section 4 of my proof.

1.21 The Rule 6 Party also highlighted within the Accessibility SoCG, that they also do not agree that safe and suitable access for all users would be provided in accordance with NPPF Paragraph 115 (b). I shall address this in Section 6 of my Proof.

1.22 The Rule 6 Party also highlighted in the Accessibility SoCG, that they do not believe the route to the proposed secondary school (for off-site residents) has been fully assessed. I shall also address this in Section 4 of my Proof.

Summary

1.23 For ease of reference, I have below provided a summary of the aforementioned consultation responses received since the Transport Assessment and Travel Plan was prepared in May 2024, and the subsequent responses that my team have provided:

Table 1: Document Production

Document	Date
Transport Assessment (CD7.1)	May 2024
Travel Plan (CD7.5)	May 2024
TN01 – ATE response (CD7.8)	October 2024
TN03 – ATE response (CD7.9)	November 2024
Formal Response to AVAG (CD15.5)	December 2024

TN04 – Shropshire Council highways response (CD7.10)	December 2024
TN05 – Staffordshire County Council highways response (CD7.13)	December 2024
TN07 – Staffordshire County Council highways response (CD7.14)	May 2025

1.24 The scheme was refused permission on 16th December 2025. There were no highways related Reasons for Refusal (RfR).

1.25 Neither the Local Highway Authority (Shropshire Council), nor the neighbouring Highway Authority (Staffordshire County Council), nor Active Travel England raised any objection to the scheme.

1.26 It is noted that part of RfR1 included the following wording:

“Development in this location would be incompatible with the principles of sustainable development in that it would undermine the development strategy set out in the adopted Shropshire Council Core Strategy and Site Allocations and Management of Development (SAMDev) Plan which seek to facilitate residential development within a sustainable settlement hierarchy.”

1.27 During the Case Management Conference (CMC) which was held on 5th June 2026, it was confirmed that the LHA:

- would not be defending RfR1; and,
- that RfR1 did not relate to highway and transport issues.

It was also agreed by both parties during the CMC that the issue relating to ‘*principles of sustainable development*’ represents a crossover with Planning specialists. As such, I will defer to Ms Megan Wilson who has addressed such issues of RfR1 within her Proof of Evidence (CD1.10). The Sustainability SoCG was also signed by the appellant, SC and ADAG on 23rd July 2026.

1.28 The Inspector’s Post-CMC Note (CD1.9) identified ‘Main Issue 5’ as being an area of dispute. This relates to:

“whether future occupants of the proposed development would have adequate access to a range of facilities and services”.

1.29 This also aligns with comments raised by The Rule 6 Party ADAG within their Statement of

Case (CD3.3).

1.30 This Proof of Evidence has therefore been prepared to address 'Main Issue 5'. Additional drawings have also been prepared as requested by the Inspector at Paragraph 37 of the CMC Summary Note in relation to access to facilities for pedestrians and cyclists. These are Drawing Numbers 2530067.101 and 102 (**Appendix AM.2**).

1.31 For ease of reference, I have therefore listed in Table 2 to Table 4 below, the status of drawings that I shall refer to within this Proof.

Table 2: Drawings prepared as part of planning application

Drawing Number	CD Number	Drawing Title
Drawing Numbers SH5034-4PD-001 Rev B to SH5034-4PD-007 Rev B)	CD7.7	Proposed Site Access Strategy
Drawing Number SH5034-4PD-010 Rev B	CD7.12	Off-site Infrastructure Improvements
Drawing Number SH5034-4PD-011 Rev A	CD7.12	Reduction of Speed Limit on A464
Drawing Number SH5034-4PD-012 Rev C	CD7.13	Modifications to A41 / Heath House Lane / Wrottesley Park Road Junction
Drawing Number SH5034-4PD-014	CD7.14	Reduction of Speed Limit on A41

Table 3: Amended drawings prepared in advance of the SoCGs

Drawing Number	CD Number	Drawing Title
Drawing Numbers 2530067.61.01 to 2530067.61.07	CD7.15	Proposed Site Access Strategy

Table 4: Drawings prepared to address Planning Inspector Post CMC Note

Drawing Number		CD Number	Drawing Title
Drawing 2530067.61.101	Number	CD7.16	Key Amenities / Facilities with Albrighton
Drawing 2530067.61.102	Number	CD7.17	Walking Route Audit

- 1.32 My evidence also addresses comments raised by the Rule 6 Party and other interested third parties.
- 1.33 Finally, my evidence will set out why there are no justified highways or transport reasons why the scheme should not be granted planning permission, as per the findings of the LHA, SCC and ATE in this regard.

2. PLANNING POLICY AND GUIDANCE

- 2.1 The following highways and transport related policy and guidance documents are either cited within the Rule 6 Party Statement of Case, or are referenced within my PoE:

National Planning Policy Framework (December 2024) (CD 2.1)

- 2.2 Within the Rule 6 Party SoC, it is stated that the scheme is contrary to Paragraphs 110 and 115 of the current NPPF. During the CMC, it was noted that in particular this relates to part 'a' and 'b' of Paragraph 115.

- 2.3 Paragraph 110 states:

"The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making."

- 2.4 I have underlined what I see to be the key part of Paragraph 110.

- 2.5 Paragraph 115 part 'a' and 'b' state:

"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

(a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;

(b) safe and suitable access to the site can be achieved for all users;"

- 2.6 Paragraph 116 states:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios."

- 2.7 Paragraph 117 states that applications for development should:

. give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

. address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

. *create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*

. *allow for the efficient delivery of goods, and access by service and emergency vehicles; and*

. *be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.*

2.8 Paragraph 118 of the NPPF states:

“All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.”

2.9 Annex 2 of the NPPF also sets out the definition of sustainable transport as follows:

“Sustainable transport modes: Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra low and zero emission vehicles, car sharing and public transport.”

Active Travel England - Rural Design Guide (July 2026) (CD2.25)

2.10 In July 2026, Active Travel England release the “Rural Design Guide” which provides technical guidance on planning and designing walking, wheeling and cycling routes and facilities in rural areas. The guidance compliments LTN 1/20 and sets out how its principles can be extended to rural areas.

2.11 The guidance has been written for applications in rural areas defined as hamlets, villages and small market towns. Therefore I deem that this guidance is applicable to the proposed site at Albrighton, as also agreed in the Accessibility SOCG (CD4.13).

2.12 Section 2.2 of the guidance states that people are walking, wheeling and cycling more, and travelling further, with distances increased by 50% since 2019. It is also stated that”

“These findings support the potential for increased active travel in rural areas, where distances to destinations are often greater.”

2.13 Throughout the evidence produced to date in relation to the planning application, and also throughout this Proof of Evidence, I maintain my position that distances of up to 2km is reasonable to replace short car trips through sustainable modes of travel such as walking

and cycling.

Adopted Shropshire Council Core Strategy (2011) (CD2.2)

- 2.14 Within RfR1, it is stated that the proposed scheme conflicts with Policies CS1, CS3, CS5, CS6 and CS17 of the Core Strategy Policies.
- 2.15 I have reviewed the adopted Core Strategy and noted that CS6 relates to Sustainable Development and Design Principles.
- 2.16 Within my PoE I shall set out why I believe that the proposed scheme aligns with the above policy CS6 insofar as the site being in an accessible location with opportunities for walking / cycling and public transport being maximised, whilst also providing highway improvements to the wider community.
- 2.17 Where Policy CS6 refers to ensuring that the development should be designed to be safe to all users, I once again highlight that the LHA raised no objection to the scheme from a safety perspective.

3. POSITION WITH LOCAL HIGHWAY AUTHORITY

Highways Statement of Common Ground (HSoCG)

- 3.1. As set out previously, there was no objection from the LHA (Shropshire Council) on 28th February 2025, subject to conditions and S106 contributions.
- 3.2. The Highways Statement of Common Ground (CD4.2) was signed by both parties (the Appellant and Shropshire Council Highways Development Control) on 10th July 2026. This sets out the areas of agreement and disagreement, and also areas to be addressed prior to the commencement of the public Inquiry.
- 3.3. The HSoCG confirms that both parties agree the only reasons a development should be refused on highway grounds are that of an unacceptable impact on highway safety, or the residual impacts following mitigation being severe.
- 3.4. The HSoCG confirms at point 11 that the scheme would not result in a significant or severe impact on the highway network following mitigation.
- 3.5. The HSoCG confirms at point 13 that the principle of the proposed site access strategy is agreed.
- 3.6. The HSoCG confirms that Active Travel England are content with the off-site active travel infrastructure improvements, and that future more detailed drawings for off-site works would be the subject of a S278 agreement.
- 3.7. Notwithstanding the above, the HSoCG contains two areas of disagreement which include:
 - Whether the likely impact of the proposed scheme has been fully addressed;
 - The level of mitigation in relation to Active Travel is sufficient to mitigate the likely impact of development.
- 3.8. Given there are no highways related reasons for refusal, and that the HSoCG confirms there is no reason to refuse the scheme in accordance with NPPF paragraph 116, I remain confused in respect of the areas of disagreement. The study area for assessment was agreed with SC, and it is set out in the HSoCG that there is no objection to the scheme in relation to highway capacity. The active travel improvements as set out in the Transport Assessment were agreed to be acceptable (point 17 of the HSoCG) in principle. Given the mitigation measures have also been accepted by ATE, I see no reason as to why the measures are no longer sufficient. I accept that any works are subject to detailed design, Technical Approval and S278 Agreement, however I see no reason as to why the principle of the measures should now be seen to be insufficient.

Current Position

- 3.9. In addition to the above, there were three areas of matters outstanding within the HSoCG, which were to be agreed prior to the commencement of the Public Inquiry. These include:
- 1) Level of financial subsidy required to provide the Bus Strategy, bus routing and threshold for implementation;
 - 2) Agreement of wording of highways related planning conditions;
 - 3) Mechanism for delivery of traffic regulations along Newhouse Lane and Patshull Lane.
- 3.10. I have attempted to engage with the Local Highway Authority in relation to the above, however at the time of preparing this Proof, I have had no response to date. In light of this, Section 5 of my Proof sets out the details of how I view the proposed Bus Strategy to be delivered.
- 3.11. **Appendix AM.3** of my Proof addresses where highways related planning conditions are required, and my view on the delivery mechanism for works. I have contacted the LHA to discuss the wording of such conditions prior to the Inquiry, however at the time of preparing this Proof I have not received a response. It is my understanding that discussions between the appellant and SC shall continue.
- 3.12. In relation to the mechanism for the delivery of traffic regulations along Newhouse Lane and Patshull Road, the principle of prohibiting through traffic is still agreed as set out in Paragraph 14 of the HSoCG.
- 3.13. Since the refusal of the application, and following the post CMC Note from the Planning Inspector, the proposed package of site access drawings (Drawing Numbers SH5034-4PD-001 to - 007 Revision B) have been updated to provide the Inspector with greater clarity in relation to the proposals. This also clarifies the traffic regulations along Newhouse Lane and Patshull Road as requested by the LHA.
- 3.14. As set out above, the principles of the access strategy as agreed with the LHA remains unchanged. The latest drawings are now shown at Drawing Numbers 2530067.61.01 to .07 (contained at **Appendix AM.2**). It is these revised drawings that I consider should be the subject of determining this appeal. The only changes to these drawings from those submitted as part of Technical Note TN04 (December 2024) are as follows:
- 3.15. Removal of reference to “Stopping Up” sections of Cross Road, Newhouse Lane and Patshull Road. The Stopping Up of a road permanently removes highway rights, and the ownership rights typically revert to the adjacent landowner or absorbed into a private development. Noting that the proposals would still allow for pedestrian, cycling and access to existing residential properties, the more appropriate mechanism for delivery would be via a Traffic Regulation Order.

This mechanism allows the road to remain a public highway with the land remaining under the control of Shropshire Council. The TRO simply restricts the use of the road (i.e prohibiting through traffic) as opposed to removing the road itself.

- The TRO process ensures that the legal status of the road remains.
- Patshull Road and Newhouse Lane would remain as active corridor routes. By removing the rights for through traffic, this represents a safer environment for more vulnerable road users to / from Albrighton.

3.16. At the time of writing the Proof, I have not had any response from the LHA in relation to agreeing the mechanism for delivery of the TROs. However the TRO process is led by the Local Highway Authority and therefore any amendments are under the jurisdiction of the LHA. The TRO would likely form part of a planning condition stating that the development cannot be occupied until the TRO is made and implemented. The TRO requires a separate statutory consultation including the police, emergency services and local press advertisement. Once the order is sealed, enforcement with the appropriate signage and infrastructure is implemented by the LHA and funded by the developer.

3.17. **Table 2 to Table 4** shows the drawings I have considered.

4. SUSTAINABILITY STATEMENT OF COMMON GROUND

- 4.1. An accessibility SoCG was signed between the appellant, SC and ADAG as the Rule 6 Party on 23rd July 2026 (CD4.13).
- 4.2. The main areas of disagreement relate to the opportunities for access to the site by sustainable modes. These issues are addressed in Section 5 of my Proof.
- 4.3. The Rule 6 Party also disagree that in accordance with Paragraph 115 (b) of the NPPF, the proposed development would provide safe and suitable access for all modes. However I have seen no further information in relation to 'how' the scheme contradicts with part (b) of Paragraph 115 of the NPPF. Ordinarily I would expect a detailed description as to why the scheme does not accord with the policy i.e visibility, geometry or compliance with standards. However I have seen nothing to date in this regard. Nevertheless Section 6 of my proof addresses why I maintain my position (as agreed with the LHA) that the scheme does indeed provide safe and suitable access for all users.
- 4.4. In relation to safety, both SC and Rule 6 Party disagree as to whether the off-site attraction of the site as a safe route to school has been fully assessed. However the consultation comments received from SC on 28th February 2025 (CD17.2) state at page 4 that the walking and cycling audit of active travel routes undertaken as part of the Transport Assessment was "*acceptable at this stage subject to further review and identification of infrastructure improvements*". The comments go on to accept that TN04 (CD7.10) summarises active travel infrastructure improvements, and that these were accepted with no further action required at that time.
- 4.5. Page 1 of the above SC consultation comments highlight how a condition should be attached to any future subsequent permission, to include a submission of a walking and cycling audit of the site. I therefore maintain my position that a sufficient assessment of walking and cycling routes to the site in its entirety (inclusive of the proposed secondary school) has already been undertaken. I wholly accept that at RM stage a more detailed assessment of internal routes to the school would be assessed, and any off-site improvements would also be subject to technical detailed design and a S278 Agreement.

5. MAIN ISSUE 5 – ACCESS TO FACILITIES AND SERVICES

- 5.1. As set out in the Planning Inspectors post CMC Note, the only highways related issue is Main Issue 5 regarding whether future occupants of the proposed development would have adequate access to a range of facilities and services. This also aligns with the comments raised by the Albrighton Development Action Group within Section 4 of their Statement of Case (CD3.3).

Pedestrian and Cycle Distances to Key Facilities

Walking

- 5.2. Table 1 of the Transport Assessment (CD7.1) sets out how, in accordance with The Institute of Highways & Transportation publication ‘*Guidelines for Providing for Journeys on Foot*’ (2000), a maximum walking distance of 2000 metres is recognised for commuting trips for staff walking to work.
- 5.3. . The CIHT ‘Planning for Walking’ 2015 guidance document (CD 2.14) Paragraph 1 and 2 of Section 2.1 states that:
- “Across Britain about 80 percent of journeys shorter than 1 mile are made wholly on foot – something that has changed little in thirty years..... For journeys that are 1 to 2 miles long, 26 per cent are made on foot (NTS 2012), more than by bus; beyond 2 miles, trips on foot are few and are outnumbered by bus trips.”*
- 5.4. The CIHT guidance goes on to state at Paragraph 5 of Section 2.1 that between 1985 and 2007:
- “the average length of pedestrian journeys increased slightly from 0.7 miles to 0.85 miles, and the average duration increased even more marginally from 15 minutes to 17 minutes (speed has increased slightly to 3.0 mph).”*
- 5.5. Manual for Streets (CD2.11) also states at Paragraph 4.4.1 that 800m walking distance is not an upper limit and references the former PPS13 guidance in respect of walking replacing short car trips particularly those under 2.0km.
- 5.6. Table NTS0303 from the 2024 National Travel Survey (August 2025) also set out that the national average walk trip distance in 2024 was 1.12km.
- 5.7. The 2024 National Travel Survey (Table NTS0308) also shows that walking was the most frequent mode used for short trips, with 78% of trips under one mile (1.6km) being completed by foot in 2024.

- 5.8. Section 2.2 of Active Travel England's "Rural Design Guide" dated July 2026 (CD2.25) states that people are walking more, and further each year. Distances have increased 50% since 2019. This therefore supports the fact that since the IHT guidance was produced, people are walking even further.
- 5.9. The above guidance therefore supports the proposition that walking provides a realistic alternative to the private car for shorter journeys for distances up to 2km. However, by no means do I suggest that all residents would choose walking as a mode of travel. Instead, walking is offered as a "genuine" choice in accordance with Paragraph 110 of the NPPF.
- 5.10. Table 1 within the Accessibility SoCG with SC (CD4.13) sets out agreed walking distance to each local facility within Albrighton. This is replicated below at **Table 5** for ease of reference.

Table 5: Indicative Walking Distances to services and facilities

Facility	Walking Distance and Time (at 1.5m/s)					
	Centre of Site		Closest Parcel		Furthest Parcel	
	Metres	Mins	Metres	Mins	Metres	Mins
Albrighton Table Tennis Club	830	9	500	6	1480	16
Albert Road Play Park	880	10	550	6	1530	17
Albrighton Primary School & District Swimming Club	920	10	450	5	1570	17
Nearest Bus Stops (Located on High Street)	1140	13	810	9	1790	20
The Red House (Village Hall)	1150	13	820	9	1800	20
Albrighton Library	1210	13	880	10	1860	21
Albrighton High Street (Co-op, Post Office, Chemist)	1250	14	920	10	1900	21
Albrighton Dental Surgery	1250	14	920	10	1900	21
Albrighton Bowling & Football Clubs	1280	14	950	11	1930	21
Albrighton Tennis & Cricket Clubs	1430	16	730	8	1900	21
Saint Mary's C of E Primary School	1780	20	1450	16	2430	27
Albrighton Medical Practice	1830	20	1500	17	2480	28
Albrighton Railway Station	1840	20	1510	17	2490	28
1st Albrighton Scout Group	1870	21	1540	17	2520	28

- 5.11. **Appendix AM.2** contains Drawing Numbers 2530067.61.101 which shows an 800m, 1.2km, 1.6km and 2km isochrone taken from an approximate centre point of the site alongside existing amenities available within Albrighton. This demonstrates how the site is well connected to the existing facilities and services within Albrighton given a significant number of existing facilities fall within the 1.6km threshold for which 78% of trips were made on foot in 2024 (National Travel Survey).
- 5.12. Albrighton Railway Station represents a circa 1.8km walk for the majority of future residents. For those living at the furthest southwest of the site, this walk would be an additional 650 metres. Should such residents decide that this distance is too far to walk to the station, they could utilise the shuttle / public transport service or cycling, noting that Albrighton Railway Station forms part of National Cycle Route 81 and has storage for 30 cycles at present (to be increased as part of the development proposals).

- 5.13. It is my opinion that a walking distance of up to 2km is reasonable to replace short trips that would otherwise be made by car. These being trips to educational establishments, railway station, employment places, retail units, services and facilities.

Cycling

- 5.14. In relation to cycling, I believe that cycle journeys would be a realistic mode choice for future residents. Paragraph 3.47 and 3.48 of the Transport Assessment (CD7.1) already demonstrates that Albrighton, Cosford, Codsall and Pattingham are within an 8km cycle distance and offer a range of employment opportunities. Furthermore, Albrighton Railway Station is within a 1.8km (6-minute) cycle distance. This means that future residents could cycle to the railway station as part of an onwards commuter trip to work in Shifnal, Telford, Shrewsbury, Bilbrook, Wolverhampton or Birmingham ranging between a 14-minute to 51-minute combined cycle and train journey time to these destinations. **Table 6** below sets out cycle distances and journey times to key facilities.

Table 6: Indicative Cycle Distances to services and facilities

Facility	Cycling Distance and Time (at 7m/s)					
	Centre of Site		Closest Parcel		Furthest Parcel	
	Metres	Mins	Metres	Mins	Metres	Mins
Albrighton Table Tennis Club	830	2	500	1	1480	4
Albert Road Play Park	880	2	550	1	1530	4
Albrighton Primary School & District Swimming Club	920	2	450	1	1570	4
Nearest Bus Stops (Located on High Street)	1140	3	810	2	1790	4
The Red House (Village Hall)	1150	3	820	2	1800	4
Albrighton Library	1210	3	880	2	1860	4
Albrighton High Street (Co-op, Post Office, Chemist)	1250	3	920	2	1900	5
Albrighton Dental Surgery	1250	3	920	2	1900	5
Albrighton Bowling & Football Clubs	1280	3	950	2	1930	5
Albrighton Tennis & Cricket Clubs	1430	3	730	2	1900	5
Saint Mary's C of E Primary School	1780	4	1450	3	2430	6
Albrighton Medical Practice	1830	4	1500	4	2480	6
Albrighton Railway Station	1840	4	1510	4	2490	6
1st Albrighton Scout Group	1870	4	1540	4	2520	6

- 5.15. I agree with 8km being an acceptable distance to which car journeys could be replaced by cycle trips, particularly with the strong link to Albrighton Railway Station.
- 5.16. There is no evidence to support the assumption that local roads are not suitable for cycling. Indeed, I have used this opportunity as part of my Proof of Evidence to review 'Strava' which is a popular web-based platform for cyclists and other athletes in the UK¹. It was first founded in 2009 in America and was subsequently rolled out worldwide thereafter. The website / app allows cyclists to explore and plan cycle routes, and review routes undertaken by other users, as well as upload their own routes to share with others.

¹ Appeal Decision see Appendix AM.7.

- 5.17. **Appendix AM.4** contains various extracts are taken from the Strava website. Whilst I accept there is no record of the period of time over which the data was gathered, it does provide an independent dataset showing trends of cyclist behaviour in the vicinity of the site. This data alone indicates there were 3,488 cyclists who recorded a cycle trip on Cross Road between the A464 and High Street, whilst there were 2,041 cyclists who recorded a cycle trip on Station Road between the A41 and High Street.
- 5.18. Appendix D of the Transport Assessment contained the manual classified counts that were undertaken of existing junctions in the vicinity of the site in March 2024. A review of this data shows that across the 9-hour survey period (6am to 10am & 2pm to 7pm) there were 30 cyclists on Cross Road between the A464 and High Street, whilst there were 16 cyclists on Station Road between the A41 and High Street.

Quality of Pedestrian and Cycle Routes to Key Facilities

- 5.19. Point 37 of the Inspectors Post CMC Summary Note invites other criteria that I consider to be relevant when assessing access to local facilities. Whilst the above has shown that the facilities within Albrighton are within an acceptable walking and cycling distance, I believe that the 'quality' of route is fundamental to encourage sustainable travel – as much as the walk / cycle distance itself.
- 5.20. The Transport Assessment prepared in support of the planning application included a walking audit as summarised in Paragraphs 3.51 to 3.74. This identified three key routes: to Albrighton Primary School via Cross Road, to local facilities on High Street via Cross Road, and to St Mary's CoE Primary School and Albrighton Railway Station. ATE and LHA confirmed agreed with these routes in their responses dated 15th 29th July 2024 and 15th October 2024.
- 5.21. I have sought to prepare Drawing Number 2530067.61.102 contained in **Appendix AM.2** which now shows more clearly the quality of three routes set out above in terms of widths, lighting provision, surfacing material, crossing points etc as requested by the Planning Inspector in Point 37 of the CMC Summary Note (CD1.9). This drawing was also shared with both Shropshire Council and the Rule 6 Party on 7th August 2026.
- 5.22. The proposals allow for new and improved pedestrian and cycle improvements between the site and the centre of Albrighton / Albrighton Rail Station as set out in Section 4 of the Transport Assessment and shown on Drawing Number SH5034-4PD-010 Revision B. These include:

- Patshull Road and Newhouse Lane being restricted for vehicle through movements and the roads forming green corridor routes (as set out in ATE “Rural Design Guide” July 2026);
- A continuous 3m shared footway cycleway on Cross Road from the development to the Cross Road / Albert Road junction;
- A new parallel crossing on Cross Road immediately east of the junction with Patshull Road;
- A package of traffic calming features on Cross Road from the development to the junction with High Street;
- A new signalised crossing on High Street immediately northwest of the staggered crossroads with Cross Road and Station Road;
- A kerb build-out and dropped kerb and tactile paving crossing on High Street circa 45m southeast of the staggered crossroads with Cross Road and Station Road;
- Upgraded footway along Albrighton Rail Station internal access road.
- A kerb build-out and dropped kerb and tactile paving crossing on Station Road at the Albrighton Railway Station access; and
- All junction crossings between the development to Albrighton Railway Station provided with new dropped kerb crossings with tactile paving (12 in total).

5.23. Therefore, whilst I have previously demonstrated that the site offers a genuine choice of transport modes for future residents, the location can be made even more sustainable (in accordance with Paragraph 110 of the NPPF) with the introduction of the above measures. In relation to the above off-site improvements, the LHA stated in their consultation response dated 28th February 2025 (CD17.2) that they have:

“reviewed the information presented and is accepting of this information/approach ... “

adding that they

“... welcome the additional consideration given to active and sustainable travel modes and measures, and no further action is required at this time”.

5.24. I note that ADAG have asserted that the scheme does not accord with the requirements of Department for Transport’s LTN 1/20 guidance. However as set out in Section 2 of my Proof, I have undertaken extensive consultation with both the LHA and ATE in relation to the proposed infrastructure improvements to be delivered as part of the scheme. Both parties reviewed the site in relation to its location and sustainability credentials in relation to local and LTN 1/20 guidance. ATE recommended Conditional Approval on 6th December 2024, with the LHA providing conditional approval on 10th June 2025.

5.25. I would draw the Inspector's attention to the fact that LTN 1/20 is heavily based upon Transport for London (TfL) pre-existing design guidance and standards, with most examples within the document being London based case studies². Indeed Active Travel England released the "Rural Design Guide" in July 2026, which provides technical guidance on planning and designing walking, wheeling and cycling routes and facilities in rural areas. The guidance has been written for application in rural areas which is defined in general terms as being:

- hamlets, villages and small market towns
- The countryside between them

5.26. The ATE "Rural Design Guide" (July 2026) guidance complements LTN 1/20 and explains how its principles can be extended to rural areas. It also updates some aspects of LTN 1/20 in light of experience and case studies since LTN 1/20 was published in 2020.

5.27. The release of ATE "Rural Design Guide" inherently indicates that there are strengths and weaknesses, opportunities and threats in relation to rural active travel that differ to that of urban environments. Indeed Section 2.2 of the guidance states:

"These findings support the potential for increased active travel in rural areas, where distances to destinations are often greater."

5.28. Page 64 of the ATE guidance also accepts that where pedestrians are walking in the carriageway, traffic flows should be less than 100 vehicles per hour. This makes Newhouse Lane and Patshull Road (which will be prohibited to through traffic) attractive green routes for pedestrians walking towards Albrighton and that no formalised infrastructure should be required along such 'green routes'.

5.29. I therefore maintain my position that LTN 1/20 must be treated with a degree of flexibility and realism, and I agree with the findings of both ATE and the LHA that the design proposals are suitable and allow for a sustainable development to be provided.

5.30. ADAG have also stated that the scheme does not comply with the requirements of the National Design Guide (2021). However, no reference is provided within their Statement of Case regarding which particular elements of the design guide the scheme conflicts with. I would draw the Inspector's attention to the Outline nature of the application and the Master Planning Statement produced by Mr Luke Hilson in relation to Urban Design, which addresses the key elements of the National Design Guide in relation to internal layout and design.

² Appeal Decision see Appendix AM.7

- 5.31. Section M2 of the National Design Guide states that prioritising pedestrians and cyclists means creating routes that are safe, direct, convenient and accessible for people of all abilities. Drawing Number 2530067.61.01 demonstrates how the proposals allow for dedicated “green routes” along Patshull Road and Newhouse Lane to allow for pedestrians and cyclist movements to be prioritised. This strategy was supported by ATE within their consultation comments dated 29th July 2024 (and is now supported at Page 64 of their recent “Rural Design Guide”). The scheme in its entirety has been designed with a pedestrian and cyclist priority – as addressed by Mr Luke Hillson in his Masterplanning Statement (CD1.12), with a focus on moving away from private car use for shorter journeys.
- 5.32. It is also important to note that the following key measures also aid to highlight and promote the sustainability credentials of the site:
- Allowance for Secondary School to be located on site and thus creation of internalised trips and limiting the need to travel.
 - Proposed interim shuttle bus (from first occupation until 250th dwelling being occupied) within the site connecting to Albrighton High Street and Albrighton Railway Station at a 20-minute frequency.
 - Proposed new bus route (from 250th dwelling occupation for a minimum period of 10-years) within the site connecting to Albrighton Railway Station, Cosford, Shifnal, Telford and Wolverhampton at a 60-minute frequency.
 - Local centre including small supermarket / medical centre / nursery / flexible office space.
 - EV hub – location to be confirmed at Reserved Matters stage however likely to be in proximity of the local centre.
 - EV charging points for all new plots.
 - 30 additional cycle spaces to be provided at Albrighton Rail Station.
 - A wide range of active travel measures as set out in Section 6 of the Travel Plan.
- 5.33. The key objective of the Travel Plan (CD7.5) is to reduce car usage and encourage alternative sustainable travel choices. The Travel Plan sets aims and tangible targets such that real change in travel behaviour can be achieved.

Public Transport Provision & Strategy

- 5.34. Within the consultation comments received from the LHA on 28th February 2025, it was stated that a new or rerouted version of the existing Service 891 through the site was accepted in

principle. Further consideration was requested in relation to the likely level of contribution that should be secured via a S106 agreement to deliver this bus service.

- 5.35. Within the consultation comments received from ATE on 4th November 2024, it was also accepted that:

“a suitable Public Transport Strategy should be brought forward at the earliest opportunity, and conditioned as appropriate, as it will influence travel patterns from the development and dictate how ambitious travel plan targets might be met.”

- 5.36. I remain in agreement with both the LHA and ATE that the provision of a bus service through the site would further enhance the sustainability credentials of the site. Within the HSoCG, it was agreed that further detail would be provided prior to the start of the Public Inquiry in relation to the likely contribution required by the LHA in order to deliver such service. I have received no feedback from the LHA since signing of the HSoCG to date, therefore I have sought to identify the likely contribution herein, and that this could form part of a suitably worded planning condition / S106 contribution.

- 5.37. The proposed public transport strategy has been set out into two phases:

- Early phases of the development (from initial occupation up to occupation of 250th dwelling) whereby a 20-minute shuttle bus would be provided in the first instance between the development site, Albrighton High Street and Albrighton Railway Station.
- Longer term strategy (after occupation of 250th dwelling) whereby a new bus route would enter the development site and travel to Albrighton Rail Station, Cosford, Shifnal, Telford and Wolverhampton at a 60-minute frequency.

- 5.38. The above strategy should remain acceptable, as has been accepted on other consented larger residential developments³.

Shuttle Bus

- 5.39. In terms of future residents living at the site, a fast and reliable bus service is also to be provided to the village centre and the Albrighton Rail Station in order for it to become another attractive alternative to the private car.
- 5.40. In order to provide an immediate bus service from the onset of development, as set out Paragraphs 8.17 to 8.22 of the Transport Assessment (CD7.1), Boningale Developments Ltd will provide a new and dedicated shuttle bus service linking the site to the village centre and Albrighton Rail station. This shuttle bus service would operate from initial occupation of the site

³ Case Study see Appendix AM.7

up to the occupation of the 250th dwelling, at which point the public bus service through the site would be operational.

5.41. The shuttle bus would accommodate up to 20 passengers. It is proposed that this will run as follows up to occupation of the 250th dwelling or the point at which the long-term public service bus would serve the site (whichever comes first):

- 20-minute frequency Monday to Saturday between 07:00 and 19:00.

5.42. The route of the proposed shuttle bus service is set out in **Appendix AM.5**. Based upon the developments Phasing Strategy set out (CD6.7), the initial phase of development would be located in the northern parcel off Cross Road. A bus stop would be provided at this location in the first instance, with the journey to Albrighton village centre (outside Crown Inn) being 1.1km / 2-minutes journey and the journey to Albrighton Railway Station being 1.7km / 3-minutes.

5.43. In order to determine the likely cost and associated contribution required to support the shuttle bus service, I have undertaken research into minibus providers across the UK who already undertake such services.

5.44. Rotala Passenger Transport have confirmed (**Appendix AM.6**) that the provision of a shuttle bus service around Albrighton including serving the site, the High Street, and Albrighton Railway Station would be £200,000 annually for a 20-seater minibus. This would operate at a 20-minute frequency, between 7am to 7pm, Monday to Saturday. The cost of a single fare would be £2.00.

5.45. The shuttle bus will be funded by Boningale Developments Ltd, alongside revenue generated by passenger fares.

Public Transport Bus Provision

5.46. The existing Banga Bus service 891 links Telford to Wolverhampton at a 60-minute frequency. Whilst we have sought to engage Banga Bus in relation to extending this service to also serve the proposed development site, to date no response has been received. The Banga Bus Service 891 is not a contract awarded by Shropshire Council and it is not subsidised by Shropshire Council. The service is purely commercial and receives no funding. Given the service receives no funding, this inherently means that the service is self-funding in terms of patronage and viability.

5.47. I have contacted Rotala Passenger Transport who have confirmed that a new public bus service could be provided between Wolverhampton and Telford, to also serve the development and Albrighton (proposed bus service is shown at **Appendix AM.5**). This would operate at a staggered time to the Banga Bus service 891, or indeed also replace the service should it fall away.

- 5.48. The cost of this new service for two single deck buses would be £373,435.30 annually (see **Appendix AM.6**). This would operate at a 60-minute frequency, between 7am to 7pm, Monday to Saturday, and staggered 30 minutes from the existing 891 service. The cost of a single fare for residents would be £3 in line with current national bus fare cap (potentially reduced to £2.00 in 2027).
- 5.49. The S106 bus contribution of £1,100 per dwelling (as suggested by Shropshire Council) could be utilised towards funding this service (i.e £880,000). As too would the £25,000 contribution per retail unit. The remainder of the cost would be funded by passenger fares. Revenue will be generated not only by residents of the proposed development, but also existing residents along the route between Telford and Wolverhampton.
- 5.50. In order to provide robust evidence, I had also sought a second quotation from The Centrebus Group, whereby the cost for the same service would be £372,538 per annum which is comparable to the above (see **Appendix AM.6**).
- 5.51. As set out above, patronage for the proposed new bus service would not be solely reliant on future residents of the site, noting that the service would also be available to residents along the entire 29km route between Wolverhampton and Telford. Nevertheless TN01 (CD7.8) set out how there would be in the order of 441 two-way bus trips per day generated by the site (by all land uses excluding the Secondary School). Based upon a bus service running for 253 days a year (excluding Sundays and bank holidays), this alone could generate £223,146 per annum (441 trips x £2 fare x 253 days) in revenue once the site is fully occupied (excluding additional revenue generated by residents along the remaining 29km route). This therefore shows how once fully built out, and taking into account bus passengers from outside the site, the bus service would be self-funding.
- 5.52. The new public bus service would operate in a stagger to the existing Service 891 (which already connects Telford and Wolverhampton), to provide a 30-minute frequency cumulatively through Albrighton (noting the existing bus stops for Service 891 are located along High Street and this service would not enter the proposed site).
- 5.53. Noting that the proposed bus route would allow a future resident to access Albrighton Rail Station in approximately 3-minutes, and that onwards connectivity is then available via rail to Telford (12-minutes), Wolverhampton (15-minutes) and Birmingham (47-minutes), the proposed bus would form part of a multi-modal trip allowing future residents to use modes other than the car. Noting that a car journey from the site to Telford or Wolverhampton is typically 20 minutes, the option of bus / rail offers a shorter journey time than choosing a private car.
- 5.54.

5.55. As set out previously, Paragraph 110 of the NPPF states that:

“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes..... However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”

5.56. I agree with the findings of the above, insofar as sustainable travel options will vary between urban and rural areas, and that it is unreasonable to expect solutions in all areas to be of the same level. Nevertheless I deem there to be a good level of public transport provision at present, which could be further enhanced in order to offer future residents a 'genuine' opportunity to travel to places of employment and other key facilities.

Other Transport Services

5.57. In addition to the above I also note there is a community transport service, known as the NS Wheelers, who operate across Shropshire would be available that future residents could utilise. This service includes a Community Car Service for individual journeys such as hospital visits and medical appointments.

6. OTHER INTERESTED PARTY HIGHWAY COMMENTS

6.1. This section of my PoE seeks to address the issues raised by other interested parties as follows.

1. Proposed road closures and rerouting
2. Existing congestion at peak times (particularly on Station Road, Shaw Lane, High Street and Cross Road).
3. Constraints including narrow lanes and increased traffic along Bowling Green Lane and Elm Road in particular
4. Safety concerns for vulnerable road users
5. Parking issues along the High Street, at the railway station and at the primary schools
6. Distance to train station and town centre leading to high reliance on cars

6.2. Item 6 has already been addressed in Section 4 of my PoE. I shall now address each of the remaining areas of concern by topic.

Proposed Road Closures and Rerouting

6.3. As shown in Drawing Number 2530067.61.01 to Drawing Number 2530067.61.07, Patshull Road and Newhouse Lane will no longer allow for 'through' traffic movements, and these would become 'Green Routes' to encourage active travel movements.

6.4. Access for existing residents along these roads, including vehicular access, would be maintained (albeit properties at the northern end of Patshull Road would only be accessible from the south through the development site, with access to / from Cross Road being prohibited). It was agreed as part of the consultation comments from the LHA on 28th February 2025, a suitably worded planning condition would be required to ensure that the engagement of this process is adequately dealt with. It is agreed with SC that the Traffic Regulation Order (TRO) to secure such traffic restrictions would follow a dedicated statutory process outside of this appeal.

6.5. The TRO is the subject of a dedicated separate application process to be led by the LHA and funded by the appellant. A suitably worded planning condition shall be agreed in relation to the trigger / threshold and level of funding for the TRO secured through the S106 agreement.

6.6. ATE supported the proposals for Patshull Road and Newhouse Lane within their consultation response dated 29th July 2024, insofar as allow for a "pedestrian led" scheme to be delivered in accordance with both the NPPF and National Design Guidance. Whilst I have been made aware at public consultation events that both Patshull Road and Newhouse Lane are already

used by leisure walkers, streetlighting shall be implemented to ensure the routes are attractive to all vulnerable road users. A suitably worded planning condition could secure a detailed lighting strategy.

- 6.7. In relation to Cross Road, Drawing Number 2530067.61.01 and Drawing Number 2530067.61.02 also shows how a circa 170 metres section of Cross Road to the east of the A464 / Cross Road junction would form part of a 'Green Route' for pedestrians / cyclists only, with access for through traffic prohibited. As part of these works, turning provision and access to existing properties along Cross Road would be maintained at each end. Similar to the above point, a TRO would be required to secure this traffic restriction, with the obligation on the appellant to fund the TRO. A suitably worded planning condition shall be agreed in relation to the trigger / threshold and level of funding for the TRO.
- 6.8. It is accepted that any works on the public highway would also be the subject of a S278 Agreement and associated detailed design works to be undertaken.
- 6.9. In relation to traffic being diverted as a result of the above, all vehicles that were recorded during the manual classified counts turning into or out of the Cross Road, Newhouse Lane and Patshull Road junctions with the A464 were subsequently reassigned onto the spine road as illustrated on Traffic Flow Figure 13 and Figure 14 contained at TN04 Appendix D.

Impact on wider road network / traffic levels / congestion

- 6.10. In response to local resident concerns relating to the impact of development traffic on the wider highway network, it is important to reiterate that in accordance with Paragraph 116 of the NPPF, the LHA found no reason to object to the scheme from a highways capacity perspective, noting there is no severe cumulative impact also.
- 6.11. As part of the Transport Assessment and TN04, the proposed traffic generation, traffic distribution, internalisation factors were agreed. This resulted in an agreed study area for traffic count surveys and subsequent capacity assessment works to be undertaken for Future Design Years. This included an assessment of 3 site access junction and 8 off-site junctions, noting 2 of the off-site junctions were within the jurisdiction of SCC.
- 6.12. As set out in the response from the LHA dated 28th February 2025, the LHA had no concern in relation to highway capacity, noting no off-site junction improvement works were required to address vehicular impact within the jurisdiction of the LHA.
- 6.13. I have seen no evidence put forward by interested parties to date to suggest that existing or future road users would use alternative routes to those already agreed with the LHA, such that this would give rise to a fundamental change in how the highway network currently operates.

Constraints along local roads (particular Bowling Green Lane and Elm Road)

- 6.14. I acknowledge that local residents have concerns regarding narrow road widths along Bowling Green Lane and Elm Road in particular, and the ability to accommodate additional development traffic.
- 6.15. The issue of potential development traffic along these routes has already been addressed in the formal response to AVAG in December 2024 (CD15.5). This sets out how the proposed development traffic distribution was agreed with the LHA. This showed that 78% of development traffic would use the southern access points onto the A464 Holyhead Road, as opposed to through Albrighton Village / Bowling Green Lane / Elm Road. Appendix N of the Transport Assessment (CD7.4) sets out how during any given peak period, the development would give rise to an additional 18 vehicles along Bowling Green Lane / Elm Road as a result of the proposals. This represents circa 1 vehicle every 3 minutes. I do not see that this level of traffic would fundamentally affect how this route currently operates.

Safety Concerns for Vulnerable Road Users

- 6.16. It is important to reiterate that Paragraph 7.5.1 of the Council's SoC states that:
- "The Council have no in principle objection to the proposed access, transport and active travel routes strategy....."*
- 6.17. The above demonstrates that the Local Planning Authority have raised no concern in relation to the provision of a safe and suitable access for all users, subject to appropriate mitigation measures being implemented and S106 obligations.
- 6.18. Furthermore, the LHA have raised no concern in relation to a safe and suitable access being provided, and the HSoCG raises no concern in this regard.
- 6.19. I therefore fail to see which element of Paragraph 115 (b) of the NPPF (provision of a safe and suitable access) the proposal conflicts with.
- 6.20. Paragraphs 3.93 to Paragraph 3.101 of the Transport Assessment included a detailed review of Personal Injury Accident data for the 5-year period of 2018 to 2022. The LHA agreed on 15th October 2024 that there were no pre-existing material safety concerns identified.
- 6.21. In relation to the proposed site access points for all road users, these have been designed in accordance with the Shropshire Council 'SMART' guidance document (CD2.13) and also the principles as set out in Manual for Streets (CD2.11) and Manual for Streets 2 (CD2.12). The geometric parameters of the site access have also been agreed with the LHA as set out in their consultation comments dated 28th February 2025.

- 6.22. The proposals allow for “green routes” along Patshull Road and Newhouse Lane which would prohibit through traffic. This provides a safer environment for vulnerable road users who choose to use these routes. Such strategy is also supported by ATE in their comments dated 29th July 2024.
- 6.23. An independent Stage 1 Road Safety Audit was also commissioned as part of TN04. This included an audit of the proposed site access strategy and also all proposed off-site improvements as set out in the Transport Assessment. Subsequent to this and as part of the RSA Designers Response, revised drawings were prepared to allow for changes to the design and provided to the LHA with no further amendments being requested.
- 6.24. In relation to vehicle speeds, whilst I appreciate there may be a perceived safety concern relating to vehicle speeds and driver behaviour, I see no evidence before me regarding recorded incidents. As set out on Drawing Number SH5034-4PD-011 Revision A, the proposals allow for a reduction in speed limit along the A464 site frontage to 40mph and is supported by the LHA. Furthermore, Drawing Number SH5034-4PD-010 Revision B shows how speed calming measures would be introduced along Cross Road as part of the proposed scheme.
- 6.25. Active Travel England have also stated within their comments dated 6th December 2024 that there are no outstanding safety concerns in relation to the scheme subject to the agreement and implementation of planning conditions and / or obligations in their response.
- 6.26. I therefore agree with the findings of the LHA, ATE and the independent Road Safety Audit, insofar as there being no safety concerns that should preclude the development coming forward, subject to the agreed mitigation and improvement measures being implemented.

Parking

- 6.27. Concern has been raised in relation to parking issues along High Street, in the vicinity of the Primary School and also at the Albrighton Railway Station.
- 6.28. As set out earlier in my PoE, the proposals would allow for a new bus provision to Albrighton Railway Station for future residents, along with the opportunity to walk and cycle within a reasonable journey time.
- 6.29. In relation to the existing Albrighton Primary School, this represents an approximate 13 minute walk distance for residents of the future site along Cross Road using the new green routes of Patshull Road or Newhouse Lane. It is therefore anticipated that the majority of trips to the school would be pedestrian based.
- 6.30. In relation to parking along the High Street, Manual for Street 2 (CD2.12) states a Paragraph 11.1.2 that features such as on street parking:

- Can provide a useful buffer between pedestrians and traffic.
- Adds activity to the street.

- 6.31. The presence of on-street parking adds activity to the street, and ensures drivers drive with caution. Noting the lack of recorded PIAs along High Street, this demonstrates that the presence of on-street parking potentially contributes to a safer road environment.
- 6.32. Given the principles of NPPF require a “pedestrian first” priority and a “vision led” approach towards encouraging sustainable travel modes, I maintain my professional view that the focus should be upon providing safer sustainable travel measures, rather than providing additional parking.

7. CONCLUSIONS

- 7.1. Part of Reason for Refusal 1 refers to development at the site being incompatible with the principles of sustainable development. However, during the Case Management Conference, it was confirmed that the Local Highway Authority would not be defending RfR1, and that it did not relate to highways and transport issues.
- 7.2. The Local Highway Authority, the neighbouring Highway Authority and Active Travel England raised no objection to the scheme, and in accordance with NPPF agree that a safe and suitable access strategy can be provided for all users. The LHA have raised no concerns in regard to highway capacity, and mitigation measures have been agreed. I accept that planning conditions and obligations would be required..
- 7.3. In terms of the sites' sustainability credentials, I have reiterated within my Proof of Evidence how in accordance with Paragraph 110 of the NPPF, there would be '*genuine*' choices of travel for future residents of the site. The majority of facilities within Albrighton Village are within a 20 minute walk and 5 minute cycle journey time from the centre of the site, which I find to be an acceptable journey distance. I have also assessed the quality of the routes (for both pedestrians and cyclists) between the site and the facilities in Albrighton, highlighting how I agree with the findings of ATE that the proposed improvements would offer an attractive alternative to the private car. The scheme also offers the opportunity for residents to use public transport, with all future residents being within a 400m walk distance of a proposed bus stop as part of the proposed bus strategy. The bus journey to the rail station would be circa 2 minutes with residents then having opportunities for onward travel to Birmingham, Telford, Wolverhampton and Shrewsbury.
- 7.4. In view of the above, I consider there to be no highway or transport reasons to withhold planning permission.

Appendix AM.1 Drawings 2530067.61.01-07

Appendix AM.2 Drawing 2530067.101 and 102

Appendix AM.3 Suggested Conditions and Delivery Mechanism

Appendix AM.4 Strava Data

Appendix AM.5 Bus Strategy & Routing

Appendix AM.6 Bus Costing

Appendix AM.7 Appeal Decisions and Case Studies Referenced





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