

**Highways Proof of Evidence
of Mr John Russell**

**Residential Development
Patshull Road, Albrighton, Shropshire**

On behalf of
Albrighton Development Action Group

August 2026

PINS Ref: 6007402

CONTENTS

1.0 INTRODUCTION..... 1

2.0 RELEVANT TRANSPORT POLICY..... 4

3.0 WALKING ACCESSIBILITY..... 6

4.0 JOURNEYS BY CYCLE..... 12

5.0 PUBLIC TRANSPORT 19

6.0 SUMMARY AND CONCLUSION (WHICH SERVES AS A SUMMARY OF THIS PROOF OF EVIDENCE)..... 25

APPENDICES

A NETWORK RAIL SERVICE RELIABILITY RESPONSE

1.0 INTRODUCTION

Author's Qualifications and Experience

- 1.1 My name is John Norman Russell. I am a Chartered Transport Planner, being a Chartered Member of the Institute of Logistics and Transport (CMILT) and a Member of the Chartered Institution of Highways and Transportation (MCIHT). I have an Honours Degree in Civil Engineering. I am a Director of JR Transport Planning Limited a consultancy that specialises in transport planning, traffic engineering and highway design.
- 1.2 I started my career in the field of traffic engineering and transportation planning 1991. I have held senior positions at a variety of companies involved in land development including RPS (Technical Director), Royal Haskoning (Advisory Group Director for Transport UK South) and SCP (Regional Director London). Most recently and immediately prior to establishing my own business, I was a company Director of Motion Consulting Ltd. In any one year, I am responsible for providing highway design, road safety, transport sustainability and transport impact advice to a wide variety of new development and redevelopment projects including arriving at agreement with statutory authorities regarding suitable mitigation.

Representations

- 1.3 I am instructed by the Albrighton Development Action Group ('the Rule 6 party') to advise on transport sustainability matters with respect to planning application reference 24/02108/OUT which seeks permission for:

'Outline application to include access for a mixed-use development comprising up to 800 no dwellings, a care home of up to 80 units, a secondary school and local centre with associated access, infrastructure, landscaping and drainage.' (hereafter referred to as 'the Proposed Development').

- 1.4 The Proposed Development is located on land at Patshull Road, Albrighton, Shropshire (hereafter referred to as 'the Appeal Site').
- 1.5 I am familiar with the Appeal Site and its surroundings having visited the Appeal Site on several occasions.

Scope of Evidence

- 1.6 My evidence is prepared in relation to Transport Accessibility of the Appeal Site, specifically that:
- a. the Appeal Site is poorly-related to the existing built-up area of Albrighton and that the Proposed Development is not located in a location which is or can be made sustainable contrary to National Planning Policy Framework ("the NPPF"), paragraph 110.

- b. travel distances from the Proposed Development to a range of services and facilities within Albrighton cannot be suitably achieved from the whole Appeal Site. As a consequence there is not a credible prospect of future residents accessing Albrighton, the existing range of services and facilities via walking or cycling.
- c. little weight can be afforded to a new or re-routed bus service, as currently proposed, to travel through the Appeal Site and link with key facilities.
- d. the benefits of transport and active travel routes for the Proposed Development are yet to be fully formed.
- e. sustainable modes of travel serving the Appeal Site have not been prioritised contrary to the requirements of NPPF paragraph 115(a).
- f. it has not been demonstrated in terms of active travel that the significant impacts of the proposed development can be acceptably mitigated, as the Council and the Rule 6 Party do not consider that the full impacts have been fully assessed.
- g. the level of mitigation in relation to Active Travel is insufficient to serve demand arising from the Proposed Development, whether from residents of the Appeal Site or people travelling to the Appeal Site, including safely to access schools.
- h. Because of a paucity of active travel infrastructure connecting the Appeal Site to everyday destinations, it has not been demonstrated that people can safely and easily access the Appeal Site, contrary to paragraph 115(b) of the NPPF

1.7 The Rule 6 Party, the Appellant and Shropshire Council have worked proactively in order to reach a Statement of Common Ground on Accessibility¹ (ASoCG). The matters raised above remain those on which the Rule 6 Party continue to consider the Proposed Development to be deficient.

Structure of the Appeal Statement

1.8 My evidence covers the following matters:

- 1. In Section 2 I consider the transport policies of relevance to this Appeal.
- 2. In Section 3 I consider walking accessibility.
- 3. In Section 4 I consider cycling accessibility.
- 4. In Section 5 I consider Public Transport accessibility.
- 5. In Section 6 I provide a summary and conclusion

1.9 My overall conclusion is that the Proposed Development would not provide a genuine choice of transport modes and so does not represent transport-sustainable development contrary to paragraphs

¹ CD4.13

110 and 115(a) of the NPPF. The absence of suitable protection for cyclists would not be conducive to safe and suitable access by this mode contrary to paragraph 115(b) of the NPPF.

- 1.10 At the time of preparing this proof of evidence, the contemporary version of the NPPF was the version published in December 2024 and updated with minor technical corrections in February 2025. Since completing the proof of evidence, the Government has issued a new version of the NPPF (issued 17th August 2026) which differs materially from the February 2025 version. It is intended that the changes in policies and policy references relevant to transport accessibility will be dealt by way of an addendum proof of evidence.

The evidence which I have prepared and provide for this appeal in this proof of evidence is true to the best of my knowledge and belief 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.

2.0 RELEVANT TRANSPORT POLICY

National Planning Policy

- 2.1 The Government's planning policies for England are set out in the National Planning Policy Framework ("the NPPF"), published in December 2024 and updated with minor technical corrections in February 2025. The NPPF highlights the need for close coordination between land-use planning and transport planning to support sustainable development.
- 2.2 The TAR refers to the December 2023 version of the NPPF. Whilst this may have been the version which was current when the TAR was prepared in May 2024, the references within the TAR to national policy are incorrect and were incorrect at the time the planning application was determined. No addendum has been provided correcting this error.
- 2.3 Paragraph 110 of the Framework states the following:
- '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 It is noted that paragraph 110 does not require that every location considered for development must have access to every sustainable mode of travel. It does, however, require that the choice of transport modes should be 'genuine'.
- 2.5 The NPPF provides no definition of the term 'genuine' with reference to choice of transport modes. The inclusion of the term 'genuine' must logically signal the government's intention that the mere presence of transport modes does not meet the policy requirements. Instead, the choice of transport modes should be sufficiently attractive that people could reasonably be expected to use them. In the alternative, the government could have omitted the word 'genuine' and simply required 'a choice of transport modes'.
- 2.6 Paragraph 115 of the Framework states the following:
- '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;*
- 2.7 Turning to the National Design Guide, this identifies walkable distances as being:

'Walkable: Local facilities are within walking distance, generally considered to be no more than a 10 minute walk (800m radius).²'

- 2.8 This theme of 800m walkable neighbourhoods is reiterated in more specific design guidance including 'Planning for Walking' published by the Chartered Institution of Highways and Transportation ('CIHT 2015')³, April 2015.

² CD2.9 Page 20

³ CD2.14 Section 6.3 and 6.4

3.0 WALKING ACCESSIBILITY

Design Guidance

- 3.1 The Chartered Institution of Highways and Transportation (CIHT) 'Guidelines for Providing Journeys on Foot' (CIHT 2000)⁴ suggests acceptable, desirable and preferred maximum walking distances ('acceptable' walking distances would vary between individuals). These walking distances are applied consistently when assessing the reasonable walking times whether a development is in a rural or an urban location.
- 3.2 Table 3.2 of the CIHT 2000 Walking Guidance summarises the suggested walking distances for pedestrians without mobility impairment for some common trip purposes. This table is reproduced below. For comparison I have added in brackets the typical equivalent walking time for the distances identified in the CIHT 2000. CIHT 2000 paragraph 3.32 states that the distances in the table below '*...may be used for planning and evaluation purposes.*' These are agreed assessment distances in ASoCG.

	Town Centres	Commuting/ Schools	Elsewhere
Desirable	200	500	400 (5 minutes' walk)
Acceptable	400 (5 minutes' walk)	1,000 (12.5 minutes' walk)	800 (10 minutes' walk)
Preferred Maximum	800 (10 minutes' walk)	2,000 (25 minutes' walk)	1,200 (15 minutes' walk)

Table 3.1: Reasonable Walking Distances (metres) for different Journey Purposes

- 3.3 The guidance above identifies that it is reasonable to assume that some people would walk a distance of up to 2km for a commuter journey. To be clear, this is a journey from home to a place of work and not from home to an intermediate location from which to continue the commute by another mode of travel. For all other journey purposes, the distances which it is reasonable to assume people will walk are significantly shorter.
- 3.4 Paragraph 3.32 of the CIHT 2000 Walking Guidance states that the distances I have reproduced in table 3.1 '*...may be used for planning and evaluation purposes.*'
- 3.5 The above guidance was published in 2000. When read in comparison to the Government's current guidance set out in the National Design Guide regarding walkable neighbourhoods in which services and facilities are within an 800m walk it is noteworthy that the guidance in table 3.1 broadly aligns with this 800m walkable theme. In the CIHT 2000 Walking Guidance, 800m is the recommended maximum

⁴ 'Guidelines for Providing Journeys on Foot', 2000, published by the Chartered Institution of Highways and Transportation

reasonable distance people can be expected to walk to a town centre and the acceptable distance to all other destinations excepting places of work, education or sight-seeing.

3.6 Since 2000, the CIHT has published further guidance in relation to planning for walking in their document 'Planning for Walking', April 2015 ('CIHT 2015').

3.7 The CIHT 2015 Walking Guidance advises:

'Most people will only walk if their destination is less than a mile away. Land use patterns most conducive to walking are thus mixed in use and resemble patchworks of "walkable neighbourhoods," with a typical catchment of around 800 m, or 10 minutes walk.'

3.8 And qualifies the above statement with the following:

'Walking neighbourhoods are typically characterised as having a range of facilities within 10 minutes' walking distance (around 800 metres). However, the propensity to walk or cycle is not only influenced by distance but also the quality of the experience; people may be willing to walk or cycle further where their surroundings are more attractive, safe and stimulating. Developers should consider the safety of the routes (adequacy of surveillance, sight lines and appropriate lighting) as well as landscaping factors (indigenous planting, habitat creation) in their design.'

3.9 This directly contradicts the Appellant's claim within their transport assessment report⁵ that residents will routinely walk up to 25 minutes (approximately 2km) for a range of journey purposes. The Appellant has provided no empirical evidence to support such an assumption.

3.10 The attractiveness of travelling to and from a site by foot is thus a function of:

- Journey distance; and
- Infrastructure for safe and convenient journeys on foot

3.11 These factors are considered below in relation to the Appeal Site.

Walking Journey Distance

3.12 The table below reproduces the destinations set out in Table 1 of the ASoCG. It identifies the walking distances from the centre, closest point and furthest point of the Appeal Site to each destination. These distances are agreed between the parties through the ASoCG. The ASoCG also provides walking times based on an assumed average walking speed of 1.5m/s (5.4km/h)

3.13 In my opinion, this represents a relatively brisk walking speed that assumes uninterrupted progress and does not account for delays that are typically encountered on pedestrian journeys, such as waiting to cross roads. I do not consider it representative of the average walking speed that most people are able

⁵ CD7.1

to maintain over a journey. By comparison, MfS⁶ states at paragraph 4.4.1 that a 10-minute walk equates to approximately 800m, which is equivalent to an average walking speed of 1.33m/s (4.8km/h). The same average walking speed is also identified in CIHT 2000 at paragraph 3.30. Nonetheless, my assessment below is based on the quicker walking speed of 1.5m/s which the Appellant has used.

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	1,480	16
Albert Road Play Park	880	10	550	6	1,530	17
Albrighton Primary School & District Swimming Club	920	10	450	5	1,570	17
The Red House (Village Hall)	1,150	13	820	9	1,800	20
Albrighton Library	1,210	13	880	9	1,860	20
Albrighton High Street (Co-op, Post Office, Chemist)	1,250	13	920	10	1,900	21
Albrighton Dental Surgery	1,250	14	920	10	1,900	21
Albrighton Bowling & Football Clubs	1,280	14	950	10	1,930	21
Albrighton Tennis & Cricket Clubs	1,430	14	730	11	1,900	21
Saint Mary's C of E Primary School	1,780	16	1,450	8	2,430	21
Albrighton Medical Practice	1,830	20	1,500	16	2,480	27
1st Albrighton Scout Group	1,870	20	1,540	17	2,520	28
Albrighton Railway Station	1,840	21	1,510	17	2,490	28

Table 3.2: Walking Distances (metres) to Local Facilities, Amenities and Public Transport

3.14 The table above identifies walking distances from the closest point of the Appeal Site, its centre, and its furthest point. However, it should be noted that the Appeal Site is roughly triangular in shape, with the apex closest to Albrighton and the base forming the furthest extent from the village. Consequently, the

⁶ CD2.11

majority of residential development is likely to be concentrated towards the southern part of the Appeal Site, around the centroid of the triangle, rather than towards the apex. For the purposes of this assessment, I have nonetheless adopted the walking distances from the "centre of site". While some future residents would be located closer to Albrighton, the shape of the Appeal Site means that a greater proportion can reasonably be expected to live further from the village.

- 3.15 In particular I note that the distance from the walk from the High Street to the nearest point of the Appeal Site is 920m. However, this represents only the distance to the apex of the triangular site. A pedestrian would then need to walk almost a further 1,000m through the Appeal Site to reach its furthest extent.
- 3.16 Returning to table 3.2, this identifies that there are no facilities and amenities within an 800m walk of the approximate centre of the Appeal Site.
- 3.17 The CIHT 2000 guidance identifies a preferred maximum reasonable walking distance for "elsewhere" as being 1,200m – which is an approximately 15-minute walk when covering 800m in 10 minutes. Applying this distance to Table 3.2 identifies the following facilities and amenities:
1. Albrighton Table Tennis Club
 2. Albert Road Play Park
 3. Albrighton Primary School & District Swimming Club
 4. The Red House (Village Hall)
 5. Albrighton Library
- 3.18 There are no other facilities or amenities within reasonable walking distance based on either the CIHT 2000 guidance or the CIHT 2015 guidance. This includes no health facilities and no retail opportunities.
- 3.19 Consequently, based on the current situation, it is unrealistic to expect that many journeys to everyday destinations will be undertaken on foot. The spatial separation between the Appeal Site and key facilities will act as a strong deterrent to walking as a primary mode of travel. This is hardly surprising given that the Appeal Site is located in countryside outside of the existing village.

Mitigation

- 3.20 In response the Appellant is proposing to provide land within the Appeal Site for:
1. a local centre which could have a GP surgery and pharmacy, supermarket, and flexible employment space; and
 2. a secondary school.
- 3.21 These, if provided, would all be within a walkable neighbourhood distance of the Appeal Site and this would improve the connectivity of residents to everyday facilities. However it is noted that:
1. There is no commitment to providing the School, which is outside the control of the Appellant
 2. There is no commitment to providing the GP Surgery, pharmacy or supermarket, which are outside the control of the Appellant

- 3.22 In short, whilst land has been safeguarded within the Appeal Site for the provision of these facilities, the Appellant is not in a position to guarantee either their delivery or the timing of their provision.
- 3.23 In circumstances where a development already benefits from access to a reasonable range of existing everyday facilities, and the intention is for new on-site provision to supplement and enhance those facilities within a walkable neighbourhood, such an approach may be acceptable. Even if there were delays in delivering the proposed facilities, future residents would nevertheless retain access to an existing, albeit limited, range of everyday destinations.
- 3.24 The position at the Appeal Site is materially different. At present, there are no everyday destinations within a walkable neighbourhood distance. Consequently, if the Proposed Development were occupied before the on-site facilities were delivered, residents would have little realistic opportunity to access day-to-day services on foot. In my opinion, this creates a significant risk that the development could become substantially, or even fully, occupied before those facilities are provided, with no planning mechanism currently before the Inquiry to ensure that the delivery of the facilities is aligned with the occupation of the development.
- 3.25 Furthermore, as presented in the Appeal Documents, the scale of the safeguarded facilities—particularly the proposed secondary school—suggests that they are intended to serve not only the Appeal Site but also the wider Albrighton area and potentially a broader catchment. It follows that the majority of users of these facilities are likely to travel from outside the Appeal Site.
- 3.26 Those visitors would experience the same pattern of spatial separation in travelling to the proposed facilities as residents of the Appeal Site would experience when travelling to existing facilities within Albrighton. Consequently, the opportunities for journeys on foot would remain limited, and it is likely that the overwhelming majority of trips to and from these facilities would be made by motorised modes.

Conclusion regarding Walking Accessibility

- 3.27 For the reasons set out above, I conclude that the Appeal Site is not located within a walkable neighbourhood as set out in the National Design Guide or the Chartered Institution of Highways and Transportation guidance. From the approximate centre of the Appeal Site there are no existing everyday facilities within an 800m walking distance and only a limited number of community facilities fall within the preferred maximum 1,200m walking distance. In particular, there are no retail or healthcare facilities within distances that national guidance regards as reasonably walkable.
- 3.28 Whilst the Appellant proposes land for a local centre and secondary school, these facilities are not secured, their timing is uncertain, and their delivery is outside the Appellant's control. There can therefore be no certainty that future residents would benefit from them when the development is occupied. Even if delivered, they would provide only a limited range of facilities and would not

overcome the Appeal Site's fundamental spatial separation from the existing village, leaving residents reliant on the wider range of everyday services and facilities in Albrighton.

- 3.29 This separation is further accentuated by the Appeal Site's broadly triangular shape, with the weight of development likely to be located towards its southern extent rather than the apex nearest Albrighton. The adopted "centre of site" walking distances therefore provide a reasonable and conservative basis for assessment, whereas measuring from the apex is of almost no relevance, as very few residents would be located at this point. As demonstrated in Table 3.2, facilities within reasonable walking distance of the centre of the Appeal Site are extremely limited.
- 3.30 My conclusion is that it is unrealistic to expect a significant proportion of everyday journeys to be undertaken on foot. Walking is therefore unlikely to become an attractive or practical mode of travel for most day-to-day trips, for people travelling to or from the Appeal Site.
- 3.31 The Appeal Site has therefore not been demonstrated to provide safe and suitable opportunities for walking, nor to promote sustainable travel in the manner sought by paragraphs 110 and 115(a) of the NPPF.

4.0 JOURNEYS BY CYCLE

Design Guidance

- 4.1 The Chartered Institution of Highways and Transportation (CIHT) identifies that the bicycle can reasonably be considered a potential mode of transport for most people (subject to suitable infrastructure provision, in particular the level of protection afforded to cyclists from traffic which is set out in the Government's guidance note LTN1/20) for all journeys under five miles (approximately 8 kilometres) (Planning for Cycling, 2014⁷).
- 4.2 Local Transport Note 1/20 (LTN 1/20), Department for Transport, 2020 provides guidance on the design of cycle infrastructure LTN1/20 is the government's current guidance on designing infrastructure for cyclists in order to encourage a greater uptake in cycling in accordance with the Government's adopted policy '*Gear Change A bold vision for cycling and walking*' which was issued in July 2020. This was inspired by and endorsed by the then Prime Minister.
- 4.3 It is noted that the Appellant's TAR refers to LTN 2/08 as "current best practice" when considering cycle infrastructure design. LTN2/08 was superseded by LTN1/20 and was withdrawn at that time. Given that the TAR is dated May 2024, reference to LTN2/08 was irrelevant at the time of preparing the TAR because it was a document that had been withdrawn. The correct guidance was set out in LTN1/20, which continues to be the relevant Government guidance on designing cycle infrastructure. No addendum has been provided correcting this error.
- 4.4 It is clear from the Government's currently adopted cycle policy and design guidance that the outcomes of cycle infrastructure interventions are to:
1. Create better streets for cycling and people
 2. Put cycling and walking at the heart of transport, place-making, and health policy
 3. Enable people to cycle and protect them when they cycle
- 4.5 With regards to design principles '*Gear Change A bold vision for cycling and walking*' states that:
- 'In order to see the increases in cycling we want, the quality of cycling infrastructure installed on our roads must dramatically improve.'*
- and
- 'Cycling is or will become mass transit and must be treated as such. Routes must be designed for larger numbers of cyclists, for users of all abilities and disabilities.'*
- 4.6 Given the importance that Government policy places on creating a safe and attractive cycling network, it is reasonable to expect that new development should be supported by infrastructure that meets the minimum standards set out in LTN 1/20. In many respects these standards are no more demanding than

⁷ Local Transport Note 1/20 'Cycle Infrastructure Design', July 2020, published by the Department for Transport

those contained in previous guidance. The principal change introduced by LTN 1/20 is that infrastructure should enable cycling by the majority of the population, rather than only by confident or experienced cyclists.

Existing Cycle Infrastructure

- 4.7 Referring to Table 2 of the ASoCG, there is agreement that a wide range of day-to-day facilities and services lie within a reasonable cycling distance of the Appeal Site. Cycling therefore has significant potential to provide a realistic alternative to the private car, with journey distances to key destinations within Albrighton well within accepted cycling distances. The plan below illustrates a 5 km catchment, although it is agreed⁸ that journeys of up to 8 km are also realistic for many cyclists. The catchment is shown shaded red.

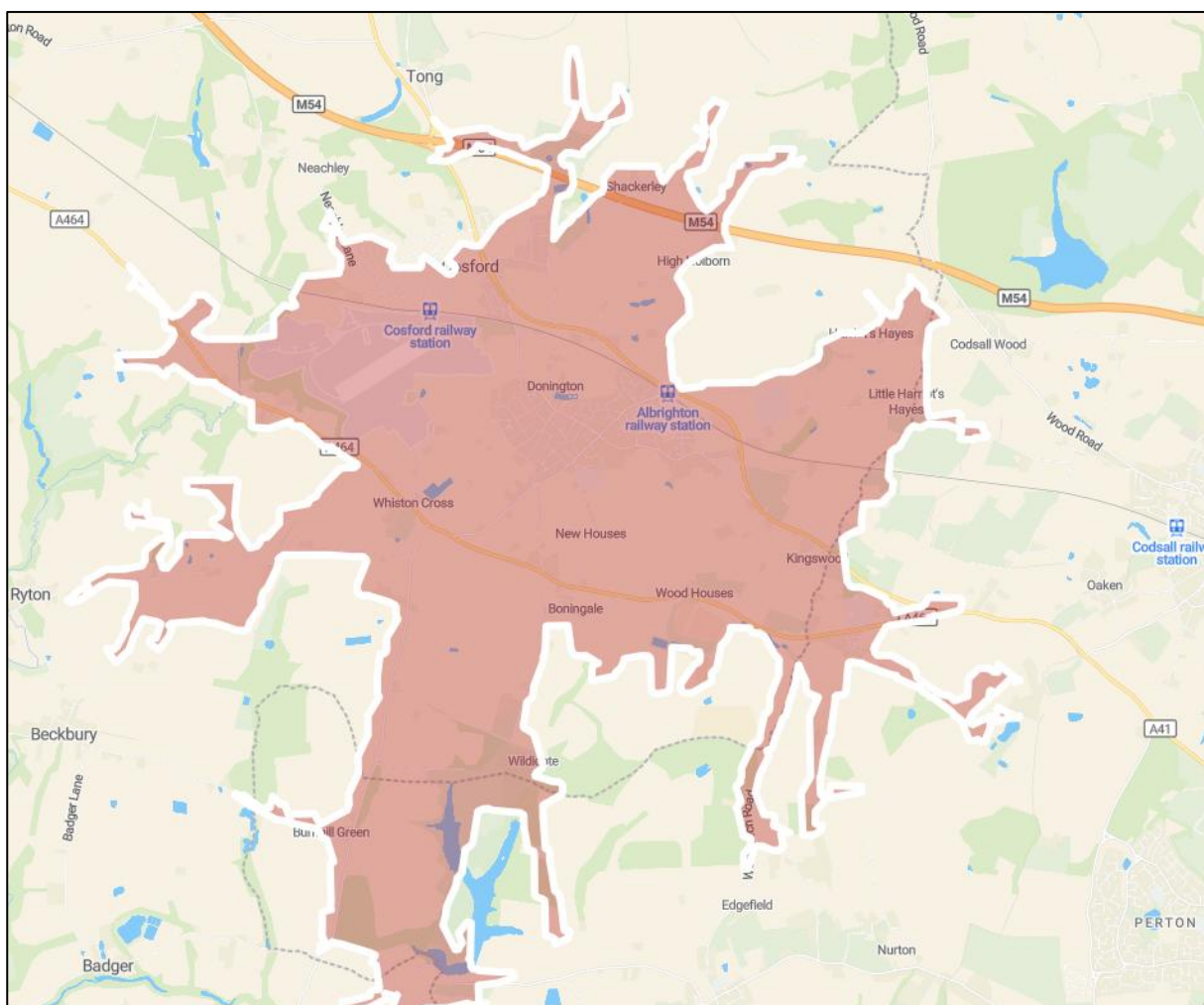


Figure 4.1: 5km reasonable cycle catchment

⁸ ASoCG paragraph 26

4.8 However, there is currently no dedicated cycling infrastructure on the highway network surrounding the Appeal Site and no continuous protected cycle routes connecting the Appeal Site with key destinations. Albrighton is of a scale where many everyday journeys could reasonably be undertaken by bicycle. Nevertheless, cycling levels remain very low. In my opinion, this indicates that the existing highway environment is not perceived to be sufficiently safe or suitable to encourage cycling by the majority of people.

Assessment of Cycle Infrastructure Requirements

4.9 The Appellant has failed to engage with the fundamental principles of LTN 1/20, particularly the requirement to consider traffic speeds and traffic volumes when determining the level of protection required for cyclists. Figure 4.1 of LTN 1/20 clearly identifies the conditions under which cycling can reasonably be expected to be attractive for all users, including less confident cyclists. Figure 4.1 is reproduced below for ease of reference.

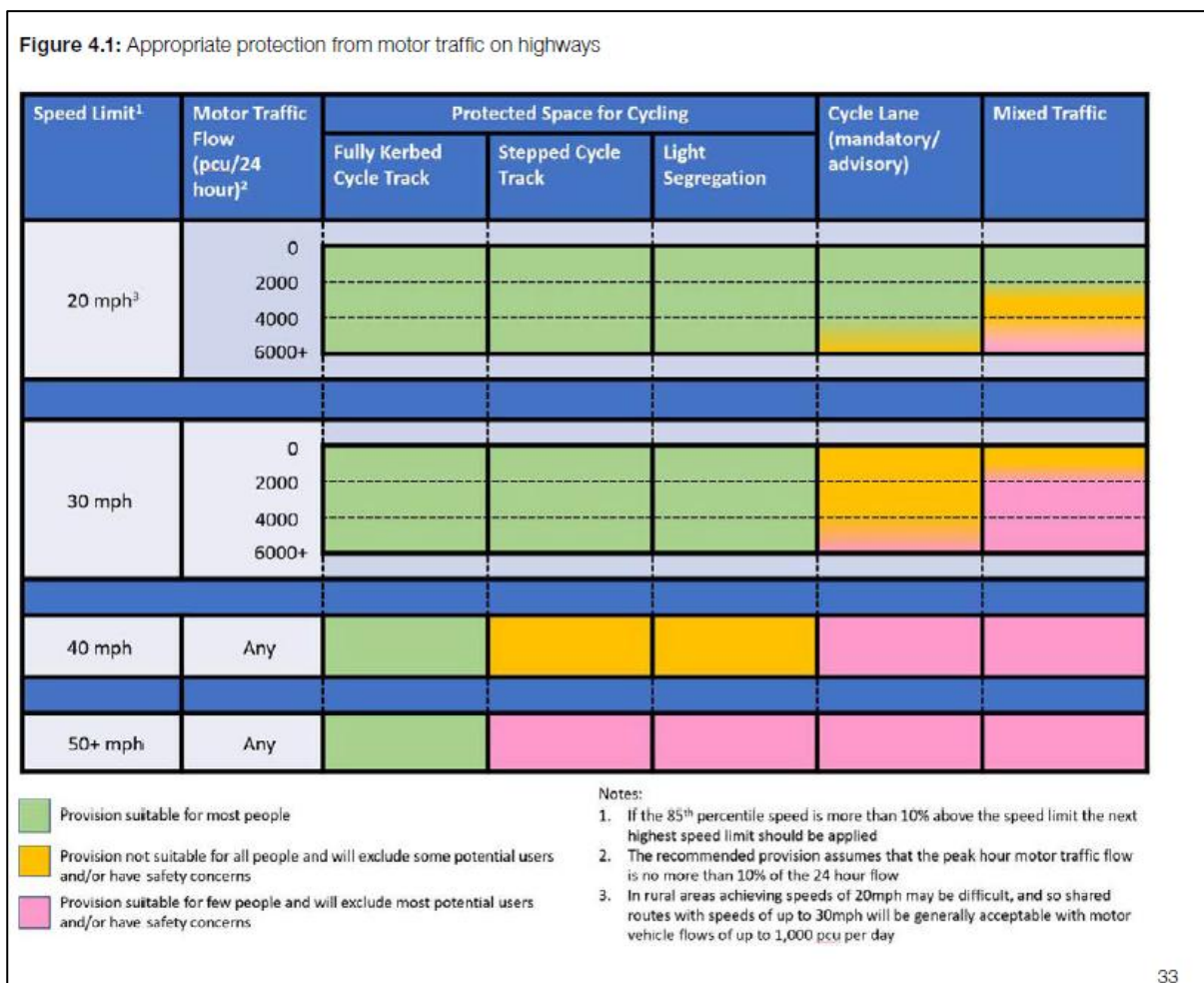


Plate 4.1: Reproduction of Figure 4.1 of LTN1/20.

4.10 No detailed assessment having regard to LTN1/20 has been undertaken of the routes that future residents would use to access key destinations, or that visitors would use to reach facilities within the

Appeal Site should these be delivered. Nor has any evidence been provided regarding existing traffic flows or vehicle speeds on those routes. Without this information, it is impossible to determine whether the existing highway network provides an appropriate environment for cycling or to identify the infrastructure interventions necessary to make cycling a safe and attractive option.

4.11 The TAR includes forecasts of traffic generation, but these are limited to weekday AM and PM peak periods. They do not consider the wider impacts of increased traffic over the course of a typical day, including reduced road safety, increased intimidation and the deterioration in conditions experienced by cyclists.

4.12 I have applied the Appellant's methodology⁹ for forecasting traffic generation, applying the available data¹⁰, including their assumptions regarding internalisation and travel by sustainable modes, to arrive at a forecast increase of approximately 5,388 vehicle movements over a 12-hour period (daily totals have not been provided). Of these, approximately 49%¹¹ (around 2,640 vehicle movements) are forecast to travel through Albrighton. An increase of this magnitude would materially alter the character of the traffic environment within the existing settlement and the very routes that people are expected to cycle on.

4.13 LTN1/20 advises:

'7.1.1 Where motor traffic flows are light and speeds are low, cyclists are likely to be able to cycle on-carriageway in mixed traffic, as shown in Figure 4.1. Most people, especially with younger children, will not feel comfortable [cycling] on-carriageways with more than 2,500 vehicles per day and speeds of more than 20 mph. These values should be regarded as desirable upper limits for inclusive cycling within the carriageway.'

4.14 Consequently, the additional traffic generated by the Proposed Development and travelling to and from Albrighton is, in isolation, sufficient to exceed the threshold identified by LTN 1/20 for inclusive cycling, even before existing background traffic is taken into account.

4.15 It is particularly noteworthy that, despite LTN 1/20 identifying **daily traffic volumes** and 85th percentile speeds as fundamental considerations in determining the appropriate form of cycle infrastructure, I have been unable to identify any such information within the Appellant's submitted evidence for the following routes:

1. Cross Road between Patshull Road and the High Street, being the principal route between the Appeal Site and Albrighton village centre;
2. Station Road, the only route connecting the Appeal Site with the railway station;
3. High Street; and
4. Elm Road, which provides an alternative route to the western part of Albrighton.

⁹ Application of the Appellant's methodology should not be taken as agreement of it.

¹⁰ CD7.1 Appendix K

¹¹ CD7.1 Appendix N

- 4.16 Without this information it is impossible to assess whether the existing highway network is suitable for cycling or to determine the level of protection required to make cycling attractive to the majority of potential users.
- 4.17 Having reviewed the limited traffic survey information submitted by the Appellant¹², I consider it reasonable to estimate that daily traffic flows on Cross Road and the High Street are likely to lie in the order of 2,000-4,000 vehicles per day. Both routes are subject to a 30 mph speed limit.
- 4.18 When the forecast additional 2,640 vehicle movements associated with the Proposed Development are added to these existing traffic levels, total daily flows are likely to increase to between approximately 4,000 and 6,000 vehicles per day.
- 4.19 Applying Figure 4.1 of LTN 1/20 to traffic volumes of this magnitude and a 30 mph speed environment demonstrates that cycling in mixed traffic would not be suitable for most people. The relevant part of Figure 4.1 identifies that these conditions would exclude most potential cyclists unless some form of protected cycling infrastructure is provided.
- 4.20 Furthermore, site observations have identified frequent on-street parking throughout the village, including along the routes identified at paragraph 4.15. In particular, the combination of parked vehicles and the narrowness of streets such as Elm Road can create additional hazards for cyclists, who are often required to move into the path of passing vehicles to negotiate parked cars. This increases the potential for conflict between cyclists and vehicles, particularly where drivers are themselves required to negotiate the constrained carriageway and parked vehicles.
- 4.21 At present, however, no such protection exists. In accordance with the Government's own guidance, the existing highway environment is therefore one that would be suitable only for "few people" and would "exclude most potential users and/or have safety concerns."

Mitigation

- 4.22 The Appellant proposes approximately 250 metres of segregated two-way shared footway/cycleway extending northwards from the apex of the Appeal Site along the western side of Cross Road¹³.
- 4.23 Whilst this provision is welcomed, it terminates before cyclists reach the more constrained sections of the highway network, where carriageways narrow, side roads become more frequent, private accesses increase and on-street parking is present. In other words, the segregated provision ends precisely where cyclists require protection the most. As illustrated on the figure below, the proposed cycleway terminates approximately 500 metres short of the High Street and approximately 1,650 metres short of the railway station. Consequently, there is no continuous protected cycle route connecting the Appeal Site with either destination.

¹² CD7.1 Appendices D and N

¹³ CD7.7 (Superseded)

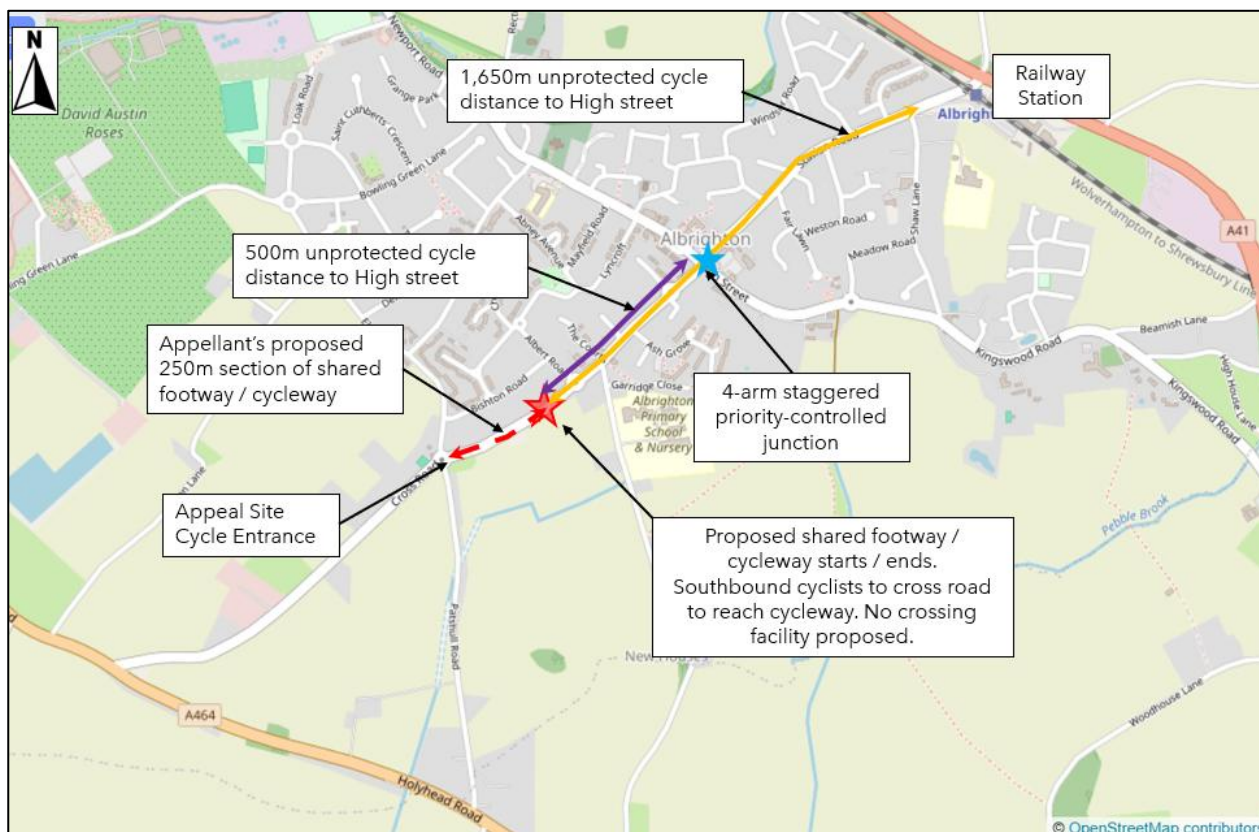
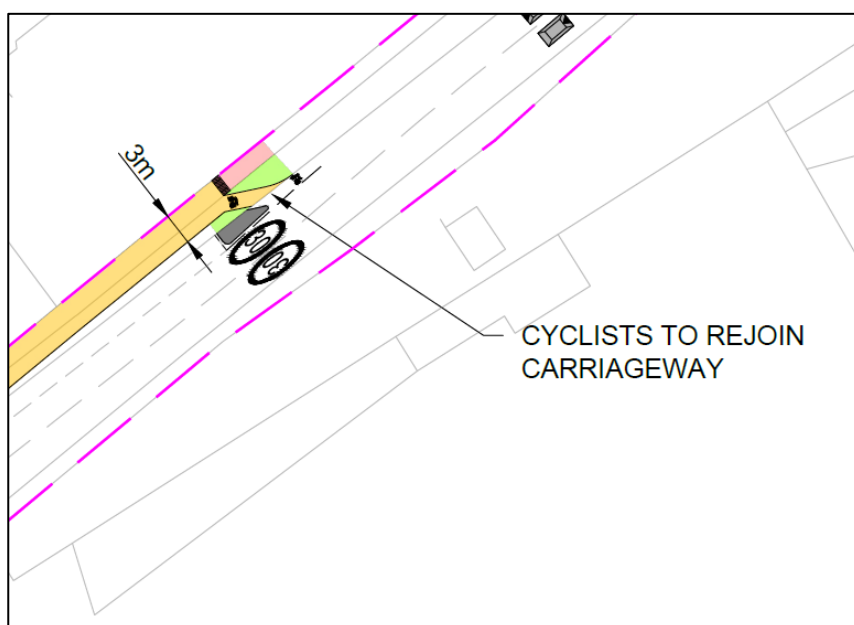


Figure 4.2: Cycle Infrastructure on Key Route

- 4.24 Furthermore, because the proposed facility is located only on the western side of Cross Road, southbound cyclists travelling towards the Appeal Site would be required to cross Cross Road in order to access the cycleway. As shown in the extract below, no crossing facility is proposed.



- 4.25 It is therefore unclear how cyclists are expected to negotiate this location safely. Are they expected to dismount, push their cycles across the carriageway and then rejoin the shared facility? Equally, cyclists

accessing the Appeal Site would subsequently be required to cross back from the western to the eastern side of Cross Road some 250m south of this point. Such manoeuvres are unlikely to be attractive to cyclists and, in my opinion, create an inherently unsafe arrangement for southbound users.

- 4.26 No dedicated cycle crossing is proposed at the High Street. Cyclists travelling to the railway station would therefore be required to negotiate a staggered four-arm priority junction. Such layouts are inherently challenging for vulnerable road users, requiring cyclists to assess traffic approaching from multiple directions and respond to numerous (up to 12) potential turning movements.
- 4.27 Conditions would become even less attractive during periods of darkness, particularly during the winter months when journeys undertaken after approximately 4.00 pm would be made in low-light conditions.
- 4.28 Cycling is fundamental to the sustainability of the Appeal Site, given its relatively poor accessibility on foot and by public transport. However, the infrastructure necessary to support cycling has neither been properly assessed nor secured. Without substantial additional intervention, cycling is unlikely to become a realistic travel choice for the majority of people travelling to or from the Appeal Site, whether residents or visitors, for example accessing a secondary school.

Conclusion Regarding Journeys by Cycle

- 4.29 For the reasons set out above, I conclude that the absence of suitable cycling infrastructure means that the majority of potential cyclists would either be deterred from cycling or exposed to unacceptable safety concerns. The Appellant has failed to demonstrate that safe and suitable cycling routes exist, contrary to NPPF paragraph 115(b).
- 4.30 Accordingly, cycling would represent an attractive travel option for only a few people rather than for the majority of residents, that Government policy seeks to encourage through paragraphs 110 and 115(a) of the NPPF.

5.0 PUBLIC TRANSPORT

Guidance

- 5.1 'Planning for Walking' published by the Chartered Institution of Highways and Transportation ("CIHT Walking Guidance"), April 2015 sets out in section 6.4 advice on walking catchments for public transport as follows:

"The power of a destination determines how far people will walk to get to it. For bus stops in residential areas, 400 metres has traditionally been regarded as a cut-off point and in town centres, 200 metres (DOENI, 2000). People will walk up to 800 metres to get to a railway station, which reflects the greater perceived quality or importance of rail services."

- 5.2 For comparison, the Transport for London (TfL) Passenger Transport Accessibility Level (PTAL) metric was established to determine an individual's accessibility to public transport using a combination of distance to a public transport node, number of services serving the node and the frequency of each. It uses a walk distance of 640m for accessibility to a bus stop and 960m for accessibility to a railway station.
- 5.3 Considering the above guidance, it is reasonable to assume that a person would walk up to 640m to reach a bus stop and 960m to reach a railway station. This equates to a walk time of 8 and 12 minutes respectively.
- 5.4 More recently, Government guidance has indicated that a 15-minute walk¹⁴ may be regarded as a reasonable distance to access a railway station providing regular services. Whilst no corresponding distance is specified, a 15-minute walk would generally encompass the 960m distance identified by TfL and, depending on local circumstances, may extend to around 1.2km. However, actual walking distances are influenced by factors including topography, crossing delays, footway provision and the needs of less mobile users.

Travel by Bus

- 5.5 There are no bus stops within reasonable walking distance of the Appeal Site.
- 5.6 It is agreed in the ASoCG that the nearest bus stop is on the High Street some 1,140m away from the centre of the Appeal Site. This is beyond the distances regarded as acceptable for regular access to bus services.
- 5.7 Existing service frequencies are also limited. The Appellant identifies¹⁵ that only around 1% of residents currently travel to work by bus, including those living in locations within the existing village of Albrighton that are better served by public transport than the Appeal Site
- 5.8 The bus provision comprises:

¹⁴ Housing Minister Steve Reid

¹⁵ CD7.5 Travel Plan Table 9

- An hourly weekday plus a Saturday daytime service in each direction
- No weekday evening services
- No Saturday evening services
- No Sunday services
- No bank holiday services

5.9 Whilst these services provide some opportunity for daytime travel, they do not constitute a comprehensive or attractive public transport network capable of meeting the full range of day-to-day travel needs.

5.10 Residents would remain reliant on the private car for many journeys, including:

- Evening employment and commuting trips;
- After-school activities and social engagements;
- Leisure journeys; and
- All travel on Sundays and bank holidays.

5.11 The limitations of the existing network are reflected in travel behaviour, with Census data indicating that only around 1% of journeys to work are made by bus.

5.12 The Appellant refers to opportunities to improve bus services. However, these appear to be aspirational rather than committed measures and dependent upon modifications to the existing limited service network.

5.13 Critically, at the time of preparing my proof, there was no obligation on the Appellants to secure the provision of an operational bus service serving the Appeal Sites. Rather, the proposed planning obligation is limited to making a financial contribution towards public transport. In circumstances where a site is already served by public transport and the contribution is intended to bolster and enhance existing services such an approach may be reasonable. Should there be any delay in implementing the enhancement, or should an alternative solution be pursued, the development would nevertheless continue to benefit from an existing level of public transport accessibility.

5.14 The position at the Appeal Sites is materially different. There is currently no public transport serving the Appeal Site. Consequently, if the Proposed Development starts to become occupied before the financial contribution has been translated into a functioning bus service, people will have no realistic opportunity to access the Appeal Site by public transport. In my opinion, this creates a significant risk that the Proposed Development would commence occupation without public transport provision.

5.15 The importance of early public transport provision is recognised in planning practice, with sustainable travel encouraged from the outset of occupation, before car-based travel habits become established. Early provision is important in securing patronage before firm travel patterns develop. The timing of public transport provision is therefore material, as services introduced only after residents have occupied the development and established car based travel habits will be less effective in influencing travel behaviour than those available from the outset.

- 5.16 It is essential therefore that an enforceable mechanism is in place to ensure that a comprehensive, operational bus service is available from the first day of occupation of the Appeal Site, rather than relying solely on the payment of a financial contribution towards delivering such a service, whose implementation is uncertain in terms of timing.
- 5.17 Equally, there is no mechanism to secure the continuation of any bus service throughout the lifetime of the Proposed Development.
- 5.18 Even if such improvements were delivered, significant limitations would remain. Residents without access to a private car would continue to face constraints in accessing employment, education, healthcare and leisure opportunities, particularly during evenings and weekends.
- 5.19 This would disproportionately affect lower-income households and those living in social rented accommodation, who are less likely to have access to a car. The 2021 Census shows that 49% of social rented households in England have no access to a car¹⁶ or van. Such households are therefore more reliant on public transport, walking and cycling to access employment, education, healthcare and other essential services. Development in locations with limited sustainable transport provision could consequently increase the time and cost of accessing these opportunities.
- 5.20 This could exacerbate transport poverty, where households are unable to access essential services due to the cost, availability or reliability of transport. The impacts would fall disproportionately on those already experiencing financial pressures and could reinforce existing social and spatial inequalities. Development should therefore be focused in locations with good access to public transport and essential services, ensuring that sustainable transport supports both environmental objectives and social equity.

Travel by Train

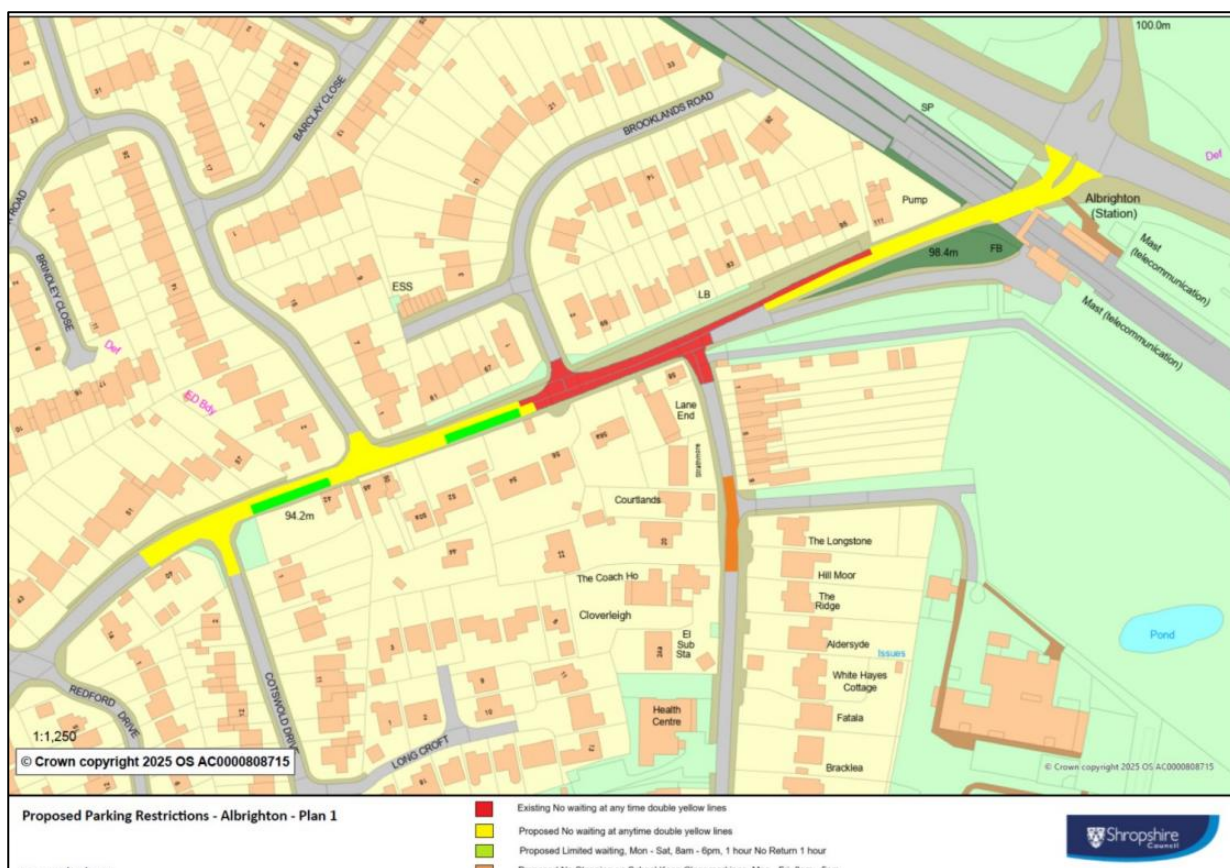
- 5.21 Albrighton Railway Station is located approximately 1.5km from the nearest point of the Appeal Site, around 2km from its approximate centre and up to 2.5km from its furthest extent. These distances substantially exceed those identified within national guidance and recognised accessibility methodologies as representing a reasonable walking distance to a railway station. In particular, the centre of the Appeal Site lies significantly beyond the 15-minute walk distance (approximately 1.2km) recently referenced by Government and is around double the walking distance assumed within TfL PTAL methodology which in itself is further than the guidance in CIHT2015.
- 5.22 The station has no step-free access for passengers travelling eastbound towards Birmingham, rendering rail travel from Albrighton inaccessible to residents with restricted mobility.

¹⁶ Table RM131 National census (2021)

- 5.23 The station is served by hourly rail services towards Telford and Shrewsbury to the west and Wolverhampton and Birmingham to the east. Whilst these provide valuable strategic connections, an hourly frequency represents only a limited level of public transport provision.
- 5.24 In addition, ADAG has sought performance data from Network Rail regarding the reliability of services operating from Albrighton railway station. The response, provided at **Appendix A**, identifies that of 18,695 scheduled arrivals between 1 January 2025 and 30 May 2026, 6,370 (34%) were recorded as late with a further 761 (4%) cancelled. Of the scheduled departures, 7,606 (40%) were recorded as late.
- 5.25 The combination of limited-service frequency, poor punctuality and access restrictions for passengers with mobility restrictions reduces the attractiveness of rail travel, even for those residents for whom the station is within convenient walking distance.
- 5.26 The limited attractiveness of rail travel is reflected in the Appellant's assessment¹⁷, which indicates that only around 3.9% of residents travel to work by train. Importantly, area which the Appellant has selected for their analysis includes a proportion of households located within a comfortable walking distance of the railway station. Rail usage typically declines as distance from a station increases. Consequently, residents of the Appeal Site, being located substantially further away, would reasonably be expected to make even less use of rail services for regular journeys.
- 5.27 Whilst the railway station is theoretically within cycling distance of the Appeal Site, for the reasons set out in Section 4, I do not consider that the existing route provides an environment in which most people would feel safe or comfortable cycling. In particular, the absence of continuous protected cycling infrastructure means that cycling is unlikely to be an attractive option for the majority of potential users. This issue is compounded by the fact that many commuters would return home after 5.00pm and, during a significant proportion of the year, would be required to undertake the return journey during periods of dusk or darkness.
- 5.28 There is no bus service connecting the Appeal Site with Albrighton Railway Station, nor is any such service proposed as part of the development.
- 5.29 Consequently, the practical means of accessing the railway station for many future residents would be by private car. This significantly undermines the sustainability benefits ordinarily associated with rail travel.
- 5.30 There is also evidence of existing parking pressure associated with the existing, limited number of users of Albrighton railway station. The station car park provides fewer than 20 spaces for which parking charges apply. I have observed on my site visits that even these few spaces are underutilised and

¹⁷ CD7.5 Table 9

understand that these are frequently underutilised, with rail users instead choosing to park on surrounding residential streets for free. This is consistent with a recently implemented traffic order amendment entitled "THE SHROPSHIRE COUNCIL (PROHIBITION AND RESTRICTION OF WAITING AND PARKING PLACES) (CONSOLIDATION) ORDER 2009 (VARIOUS STREETS, ALBRIGHTON) (AMENDMENT) ORDER". This was implemented in full on 8th July 2026 and imposes the parking restrictions set out on the plan below:



- 5.31 The introduction of these on-street car parking restrictions indicates that parking associated with the station is already placing pressure on the surrounding highway network and residential streets, with implications for highway safety and residential amenity. Additional demand arising from the Proposed Development, including commuter parking, pick-up and drop-off activity, would be likely to exacerbate these existing pressures. As can be seen from the plan above, there remains opportunity for free on-street car parking within a short walk of the railway station. The Appellant has not, however, assessed the potential impact of this additional demand or identified any mitigation.
- 5.32 NPPF paragraph 110 is clear that development should be focussed on locations which are or can be made sustainable by offering a genuine choice of transport modes. What is less clear, but which I consider to be implied, is that a site is not considered sustainable if, rather than offering a choice of transport modes directly or at a location that can reasonably and safely be accessed by other sustainable

modes, the sustainable travel opportunity presented requires the person to drive somewhere else to access it.

- 5.33 Therefore, with regards to travel by rail based public transport, the spatial characteristics of the Appeal Site do not provide an advantage to locating development at it over any other location within reasonable driving distance of Albrighton railway station. Residents without access to a car would be severely disadvantaged with regard to rail usage or excluded entirely.

Public Transport Conclusion

- 5.34 For the reasons set out above, I conclude that the Appeal Site is poorly served by public transport. Existing bus services are beyond reasonable walking distance, are limited in frequency and hours of operation, and no operational bus service is secured to serve the development from first occupation or throughout its lifetime. Likewise, Albrighton Railway Station lies well beyond recognised walking distances, cannot realistically be accessed by bus and, for the reasons set out in Section 4 of my evidence, is not safely or attractively accessible by cycle for the majority of potential users.
- 5.35 The practical consequence is that future residents would remain heavily reliant on the private car, not only for many everyday journeys but also to access the wider public transport network. In particular, many rail journeys would themselves commence with a car journey to the railway station. This significantly diminishes the sustainability benefits ordinarily associated with rail travel and means that the presence of Albrighton Railway Station does not provide a meaningful locational advantage for the Appeal Site.
- 5.36 The Appeal Site is not well connected to existing public transport by walking, cycling or bus, and the measures proposed by the Appellant do not overcome those fundamental locational deficiencies.
- 5.37 Accordingly, I conclude that public transport would represent an attractive travel option for only a few people rather than for the majority of residents, that Government policy seeks to encourage through paragraphs 110 and 115(a) of the NPPF.

6.0 SUMMARY AND CONCLUSION (WHICH SERVES AS A SUMMARY OF THIS PROOF OF EVIDENCE)

- 6.1 My evidence has considered whether the Appeal Site is located in a position that accords with national transport policy by providing a genuine choice of sustainable transport modes. In undertaking that assessment I have had regard to the National Planning Policy Framework, the National Design Guide, relevant Government guidance, and recognised professional guidance published, inter alia, by the Chartered Institution of Highways and Transportation.
- 6.2 Paragraph 110 of the NPPF requires significant development to be focused on locations which are, or can be made, sustainable by limiting the need to travel and offering a genuine choice of transport modes. Paragraph 115 requires sustainable transport modes to be prioritised, having regard to the type and location of development, and that safe and suitable access can be achieved for all users. In my opinion, the use of the word "genuine" is significant. The policy requires more than the theoretical availability of different transport modes; it requires that those modes are sufficiently attractive, convenient and accessible that people can reasonably be expected to use them for day-to-day journeys.
- 6.3 Having reviewed the Appeal proposals against that policy framework, I conclude that the Appeal Site does not satisfy those requirements.
- 6.4 In respect of walking, the Appeal Site is not located within a walkable neighbourhood as advocated by the National Design Guide or CIHT guidance. From the approximate centre of the Appeal site there are no everyday retail or healthcare facilities within the recognised 800 metre walking catchment, and only a limited number of community facilities fall within the preferred maximum 1.2 kilometre walking distance. Whilst land has been safeguarded for a local centre and secondary school, neither their delivery nor the timing of their provision is secured. Consequently, residents would not have realistic opportunities to undertake a significant proportion of everyday journeys on foot.
- 6.5 In respect of cycling, whilst many destinations lie within reasonable cycling distances, the infrastructure necessary to enable cycling by the majority of people does not currently exist. The Appellant has not assessed the surrounding highway network against the guidance set out in LTN 1/20, nor demonstrated that traffic conditions would support inclusive cycling. The limited cycle infrastructure proposed does not provide continuous protected routes to the village centre or railway station. Consequently, cycling would remain an attractive option only for a relatively small proportion of confident cyclists rather than the wider population that Government policy seeks to encourage.
- 6.6 Public transport accessibility is similarly poor. Existing bus services lie beyond recognised walking catchments, operate at limited frequencies and do not provide a comprehensive service throughout the week. The proposed financial contribution does not secure the delivery of an operational bus service from first occupation or throughout the lifetime of the development. Albrighton Railway Station, which

provides only a limited service, is also well beyond recognised walking distances, is not served by a connecting bus, and cannot realistically be accessed by attractive or safe cycling routes. For many residents, rail travel would itself begin with a journey by private car, substantially reducing the sustainability benefits ordinarily associated with rail accessibility.

- 6.7 The combined effect of these deficiencies is that future residents would remain heavily reliant upon the private car for the majority of journeys, including access to employment, education, healthcare, shopping, leisure activities and, in many cases, access to the wider public transport network itself. That outcome is reflected in existing travel patterns within the area.
- 6.8 Whilst the Appellant proposes a range of mitigation measures, these do not overcome the Appeal Site's fundamental locational disadvantages. Several key elements are aspirational, are dependent upon third parties, or are not secured through enforceable planning obligations. Consequently, there is no certainty that the infrastructure and services relied upon by the Appellant to support sustainable travel would be available when the development is occupied, or indeed at all.
- 6.9 Drawing these matters together, it has not been demonstrated that the Appeal Site is in a location which is, or can be made, sustainable in transport terms. It would not provide future residents or visitors with a genuine choice of sustainable transport modes and would instead result in a pattern of development that is predominantly dependent upon the private car.
- 6.10 For these reasons, I conclude that the Proposed Development would not provide a genuine choice of transport modes meaning that future residents and visitors would remain heavily reliant on private car travel, and the development would not achieve the sustainable patterns of movement sought by national planning policy.
- 6.11 It therefore does not represent transport-sustainable development contrary to paragraphs 110 and 115(a) of the NPPF. Furthermore, the absence of suitable protection for cyclists would not be conducive to safe and suitable access by this mode contrary to paragraph 115(b) of the NPPF.

APPENDIX A - NETWORK RAIL SERVICE RELIABILITY RESPONSE



Natasha Smith - Aguero

By email: natasha_p_s@hotmail.co.uk

Network Rail
Freedom of Information
The Quadrant
Elder Gate
Milton Keynes
MK9 1EN

16 June 2026

Dear Natasha,

Reference number: FOI2026/00863

Thank you for your email of 15 May 2026 in which you requested information on train services at Albrighton station.

I have processed your request under the terms of the Freedom of Information Act 2000 (FOIA) and I can confirm that we hold this information.

The data provided below covers the period from 1 January 2025 to 30 May 2026, in line with the most recent closed reporting period.

- 1. For all services scheduled to arrive at Albrighton in 2025 and 2026-date, how many have arrived late?**

Between 1 January 2025 and 30 May 2026, there were 18,695 scheduled stops, of which 6,370 were recorded as late.

- 2. How many have been cancelled?**

A total of 761 stops were cancelled.

3. For all services scheduled to leave Albrighton in 2025 and 2026-date, how many have left late?

Between 1 January 2025 and 30 May 2026, there were 18,695 scheduled departures, of which 7,606 were recorded as late (defined as 1 minute or more against the Great British Timetable (GBTT)).

4. How many were cancelled?

Cancellations are measured at the point of arrival rather than departure. There were 757 scheduled departures with no recorded timing data; however, not all missing records will necessarily correspond to cancellations.

I hope you find this response to be helpful. If you have any enquiries about this response, please contact me in the first instance at FOI@networkrail.co.uk. Details of your appeal rights are below.

Please remember to quote the reference number at the top of this letter in all future communications.

Yours sincerely

Hayley Ashford
Information Officer

You are encouraged to use and re-use the information made available in this response freely and flexibly, with only a few conditions. These are set out in the [Open Government Licence](#) for public sector information. For further information please visit our [website](#).

Appeal rights

If you are unhappy with the way your request has been handled and wish to make a complaint or request a review of our decision, please write to the Compliance and Appeals team at Network Rail, Freedom of Information, The Quadrant, Elder Gate, Milton Keynes, MK9 1EN, or by email at complianceandappealsfoi@networkrail.co.uk. Your request must be submitted within 40 working days of receipt of this letter.

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner (ICO) can be contacted at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or you can contact the ICO through the 'Make a Complaint' section of their website on this link: <https://ico.org.uk/make-a-complaint/>

The relevant section to select will be "Official or Public Information".