



*Objection to:*

**Planning application for the  
Shrewsbury North West Relief  
Road - 21/00924/EIA**

## Introduction

Transport Action Network (TAN) would like to formally **OBJECT** to the planning application for the Shrewsbury North West Relief Road (21/00924/EIA) which it does not believe is appropriate during a climate emergency.

## Increased carbon emissions

The proposed scheme would lead to increased carbon emissions which will make it harder for the UK to meet its commitments under the Paris Agreement and the Climate Change Act 2008. Transport is the single largest carbon emitting sector in the UK, and the only sector not to see significant reductions since 1990. Road transport makes up a significant part of total transport emissions and is therefore a critical sector where action is needed.

At 9.9.3 of Chapter 9 of the Environmental Statement the construction emissions are said to total 69,192 tCO<sub>2</sub>e. We disagree with and object to the approach taken in the scoping process in assessing the climate impacts of constructing the scheme. Emissions resulting from land use, land use change and forestry should not have been scoped out of the Environmental Impact Assessment (EIA) at Table 9-1 of Chapter 9 of the Environmental Statement (ES). We disagree with the assessment that the “Emissions from the disposal of biomass are not expected to be large” and “The reduction in carbon sequestration due to the Proposed Scheme is not considered to be large”. The impact on carbon emissions of destroying biodiversity, green fields, and other carbon sinks should have been assessed and quantified in the Environmental Statement.

Shropshire County Council (SCC) have wrongly applied the National Policy Statement for National Networks (NPSNN) to this scheme. The NPSNN only applies to Nationally Strategic Infrastructure Projects (NSIPs) as defined by the Planning Act 2008, not to schemes seeking planning consent under the Town and Country Planning Act 1990. Transport Action Network has filed a claim for Judicial Review of the NPSNN as it is not compliant with current climate change legislation<sup>1</sup>.

The claim made at 9.9.7 in the Environmental Statement that the scheme would lead to a decrease in carbon emissions from traffic is disputed. It is simply not credible to claim that this new road scheme would lead to a decrease in emissions when it has been well-established that new road building leads to new journeys (and therefore increased carbon emissions). This is the phenomenon commonly termed “induced traffic” (see below). We dispute this assessment in Chapter 9 of the Environmental Statement.

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<sup>1</sup> <https://transportactionnetwork.org.uk/campaign/legal-action/national-policy-legal-challenge/>

## Landscape

The proposed scheme would lead to an unacceptable impact on a valued landscape, particularly the flyover across the River Severn floodplain. The road will be built through Shrewsbury's 'Green Wedge'. The Green Wedge has been identified in the Big Town Plan as a unique and important feature of Shrewsbury that brings nature into the heart of the town. Shropshire Wildlife Trust says that the road "has guaranteed enormous environmental costs" and will run right next to a Site of Special Scientific Interest (SSSI) and through an ancient woodland as well as impacting multiple priority species in Shropshire. CPRE has identified the landscape in this area as being particularly valuable and the construction of an ugly concrete viaduct across the flood plain and into the lovely Shelton Rough area will have a devastating impact on this local asset that so many people have come to appreciate during the pandemic. The planning application contains no clear visualisations of the 670 metre viaduct across the valley upstream of the town.

## Increased pressure for development

The new road would inevitably place pressure on the Green Wedge for new housing development, as this land will be opened up. Car dependent housing will place greater burdens on the road infrastructure, removing the claimed congestion benefits of the scheme and leading to increased emissions. This possibility does not appear to have been explored within the traffic modelling in the planning application.

## Roadbuilding does not work

The council's own figures show limited traffic reduction in the town centre, around one car in four in peak flows, and traffic will increase on many other roads, including Berwick Rd, Ellesmere Rd North, English Bridge and the A5 by Churncote. St Michaels St, Castle St, High St etc will see no perceptible improvement. Berwick Rd will become the shortest route into town which will place considerable strain on the junction with Coton Hill but the Council's model does not think this would be a problem. There are also serious doubts as to whether these figures adequately allow for the new traffic that is 'created' when new roads are built and the planning documents offer no means of locking in any short term benefits that might be achieved. There is well established evidence that, rather than reduce congestion, new roads actually create more traffic and fail to deliver the economic benefits claimed - see SACTRA report 'Trunk Roads and the Generation of Traffic', 1994<sup>2</sup>, The end of the road? Challenging the road-building consensus (Transport for Quality of Life, 2017)<sup>3</sup>,

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[https://webarchive.nationalarchives.gov.uk/20050304041634/http://www.dft.gov.uk/stellent/groups/dft\\_econappr/documents/pdf/dft\\_econappr\\_pdf\\_022512.pdf](https://webarchive.nationalarchives.gov.uk/20050304041634/http://www.dft.gov.uk/stellent/groups/dft_econappr/documents/pdf/dft_econappr_pdf_022512.pdf)

<sup>3</sup> <https://www.cpre.org.uk/resources/the-end-of-the-road-challenging-the-road-building-consensus/>

## **Increasing severance**

The proposed scheme is a single carriageway with a 60 mph speed limit, and would lead to severance of several footpaths. There are no dedicated crossings at these points and Non-Motorised Users (NMUs) would have to make long diversions to cross the dual carriageway. The large roundabouts at the junctions will discourage cycling and do not comply with the design standards that the council signed up to last year.

## **Cost and inequality**

Road building is expensive, and it is estimated this scheme will cost SCC at least £87 million for little to no benefit, whilst destroying a valued landscape and increasing carbon emissions. The Department for Transport contribution will cost taxpayers a further £54.4 million. The money SCC proposes to spend on this scheme would be better used in providing sustainable alternatives that encourage people to use public transport, walking and cycling to access the town, and for sustainable travel across the county. A quarter of the population does not have access to a car, typically the young, the very old, the socially deprived and other vulnerable groups. This scheme will do nothing for these groups, and will simply drive up inequality, undermining the levelling up agenda.

## **Conclusion**

We object to the planning application for the Shrewsbury North West Relief Road and recommend it be rejected. We recommend instead that the council examine and invest in measures which will reduce traffic and carbon emissions, particularly public transport, walking and cycling.

7 May 2021

Chris Todd

Director

Transport Action Network

Transport Action Network provides free support to people and groups pressing for more sustainable transport in their area and opposing cuts to bus services, damaging road schemes and large unsustainable developments

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