

PROPOSED SHREWSBURY NORTH WEST RELIEF ROAD – NEGATIVE IMPACTS OF THE SCHEME

Shropshire Council, (SC) as the Applicant for the proposed Shrewsbury North West Relief Road (NWRR) has recently submitted a document summarising its claimed benefits of this scheme. As the purpose of the Environmental Assessment and Planning systems is to balance negative impacts with benefits it is unhelpful to only provide one side of the argument. There has been very substantial and well-informed opposition to the planning application for this proposed new road and it is important that the views of those opposed to the application should be set alongside the council's claims. Better Shrewsbury Transport (BeST¹) has therefore prepared this document to summarise² the significant impacts that building this road would have. We have also provided our assessment of the council's recent claims about the benefits of the scheme.

Summary

Building the proposed NWRR around almost a quarter of the town, and in particular through Shrewsbury's unique green wedge, would have the following impacts:

- Emit 48,233 tCO₂e of greenhouse gases for claimed operational savings of only 359 tCO₂e per annum;
- Increase the numbers of car journeys across Shrewsbury;
- Lead to significant additional congestion at several key road junctions across Shrewsbury;
- Have a negative effect on congestion on the A5 (part of the Strategic Road Network (SRN)) at Churncote roundabout;
- Create a significant risk to Shrewsbury's drinking water supply;
- Result in the destruction of 11 veteran trees, classified as 'irreplaceable' by the National Planning Policy Framework (NPPF) and dozens of other high quality trees. Dozens of other veteran and high quality trees would be damaged;
- Result in the destruction of or damage to 3.1 ha of woodland, 4 km of hedgerow and loss of ~100 m of important river corridor/riparian habitat;
- Result in a significant loss of biodiversity instead of the target 10% biodiversity net gain (BNG) that all new developments are supposed to achieve under the Environment Act, 2023;
- Have a major visual impact on the landscape of north west Shrewsbury;
- Have a major impact on the amenity value of areas along the route, vital "green lungs" for residents, but in particular Shrewsbury's highly regarded "Green Wedge";
- Have a significant adverse impact from noise experienced at numerous residential properties and several business/care facilities;
- Make all cycle routes out of north west Shrewsbury significantly more dangerous.

These impacts are described in more detail below.

¹ BeST is an alliance of local organisations and individuals campaigning for urgent action to promote active and sustainable modes of transport that are the only effective ways to reduce congestion, poor air quality and road deaths/injuries in the town whilst transforming all our lives for the better. The following organisations are members of the alliance: Shropshire Wildlife Trust, CPRE - Campaign to Protect Rural England, Friends of the Earth Shrewsbury Branch, Extinction Rebellion Shrewsbury Branch, Sustainable Transport Shropshire. The campaign is supported by local branches of The Green Party, the Liberal Democrats and the Labour Party.

² Our criticism of the application is set out in more detail in our responses to the various submissions by SC: Original objection [Part I](#) and [Part II](#), [Response to SC Aug 2021 letter](#), [Response to revised application](#), [Response to Feb 2023 SEI](#), and detailed comments on the [risk to Shelton PWS](#)

Greenhouse gas emissions

SC's [Chapter 9 Climate Addendum Part 1](#), Table 1.4 describes the increase in greenhouse gas emissions as a **significant adverse effect** and this was a major aspect of the numerous objections to the application from consultees³ and members of the public. The Prime Minister's recent announcement of a delay in the date at which sales of new diesel and petrol cars will presumably have an impact on these numbers (particularly in the period up to 2030 in which the [UK is not on track to adequately reduce emissions](#)) which will need to be taken into account with updated calculations.



Whilst Department for Transport (DfT) guidance and the NPPF still do not fully reflect the urgency with which greenhouse gas emissions need to be reduced, it is clear that:

- One of the stated key objectives in the outline business case for the proposed road is '*To contribute towards a reduction in greenhouse gas emissions*' [Shropshire Council Outline Business Case, 2017](#).
- Potential reductions in greenhouse gas emissions were also highlighted in the public consultation for the project and in the scoping document for the Environmental Assessment;
- Shropshire Council declared a Climate Emergency in [2019](#) and has prepared a [Climate Change Strategy Framework 2019](#) subtitled 'A Route Map to a Zero Carbon Shropshire'. Road transport is one of the most significant contributors to carbon emissions in the county accounting for over 40% of overall emissions. Among the key principles for action identified in the council's 2019 report are: "*Prioritise Actions: We need to stop adding to the problem.*"

We do not need to rehearse the increasing urgency with which the Intergovernmental Panel on Climate Change (IPCC) or the Secretary General of the United Nations have called for reductions in greenhouse gas emissions nor to present the frequent, widespread and alarming nature of extreme weather events that can now be conclusively linked to greenhouse gas emissions to suggest that the Climate Emergency is now even more of an issue than it was when SC embarked on this proposal.

Increased number of car journeys

SC's traffic modelling (see comments on this in the section below that reviews the claimed 'benefits' of the scheme) implies that building the NWRR would increase car journeys across Shrewsbury but only by 0.5%. We agree that there is well established and extensive evidence that, rather than reduce congestion, new roads (particularly those in close proximity to urban areas) create more traffic (known as "induced traffic") and fail to deliver the economic benefits claimed (e.g. SACTRA (1994) Trunk Roads and the Generation of Traffic, Standing Advisory Committee on Trunk Road Assessment, Department of Transport, London, HMSO, Beyond Transport Infrastructure. Lesson for the future from recent road projects, CPRE, 2006, The impact of road projects in England. CPRE 2017). However, the transport experts that we have consulted have concluded that a 10 % increase in induced traffic in the peri-urban setting of the proposed NWRR is a much more likely outcome, particularly if no measures are applied to constrain traffic from filling up the 'space' created by diverting traffic onto the NWRR. SC currently has no plans or funds to implement such schemes and so any road space in the town centre freed up by the proposed new road will rapidly fill up with "induced traffic".

Impacts on key junctions

SC's traffic modelling shows some benefits along the existing route between Shelton and the Ellesmere Rd/Battlefield Rd roundabout via the town centre as expected as this is the traffic that will most likely use the proposed NWRR. However, it also shows increased journeys along the roads leading to either end of the NWRR and along Berwick Road through Coton Hill which would become one of the most straightforward routes for entering the town centre from the A5 North.

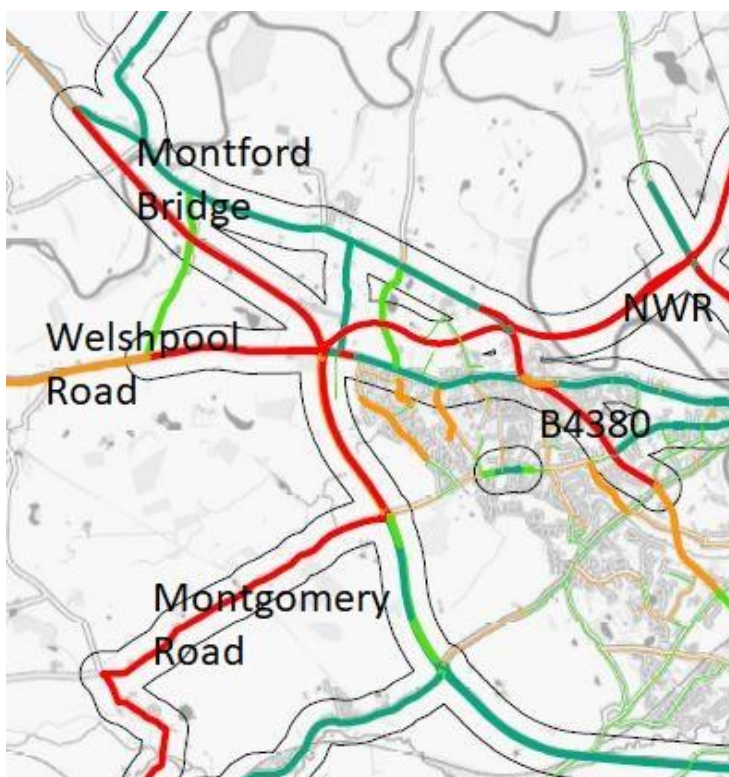
³ A list of organisations that have objected to the scheme is provided in Appendix 1.

SC proposes to tackle any issues arising from such increases using a Monitor and Manage approach, but SC's Highways Dept is very concerned about this idea given the parlous state of SC's finances and the likelihood that there will be very limited funds to address these issues when they arise. Junctions of concern for the Highways Dept include:

- Battlefield Roundabout and Battlefield Link road to Enterprise roundabout
- Harlescott Lane/Ellesmere Rod junction
- Sundorne Roundabout
- Woodcote Roundabout (Mytton Oak Road/A5) – which will now face additional traffic as the hospital becomes the only A&E department in the county.

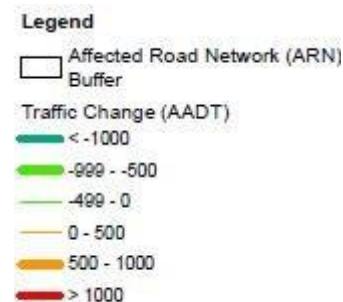
Increased congestion on A5/SRN at Churncote

According to SC's traffic flow modelling, the scheme will significantly affect the Churncote roundabout (junction between A5 and A458) on the A5, a strategic national and international route. The figure below shows the change in Annual Average Daily Total (AADT) traffic flows between the Do Something (with NWRR) and Do Minimum without NWR) scenarios in 2023 (scheme opening). This clearly shows that the opening of the NWRR would result in significant increases in the traffic flow on the A5 at Churncote roundabout (junction of Welshpool road and A5).



A5 South and West Extract from Chapter 6 Fig 6.3 (report reference 4171923)

Note, these figures are against Do Minimum, not against current levels.



During consultation with Shropshire Council on the abortive planning application for the Oxon Link Road (OLR) (18/03166/EIA), Highways England made its concerns clear regarding any increase on the number of 'arms' on the Churncote roundabout during protracted discussions. Prior to the withdrawal of the OLR application and following an initial holding response in February 2019, Highways England was still recommending that planning permission not be granted for three months to allow time for further information to be prepared and submitted by the council (Highways England letter dated 31 July 2019 available on Shropshire Council's Planning Portal). This shows that, despite significant periods of discussion, Shropshire Council had still not resolved Highways England's concerns by the time the OLR application was withdrawn and the scheme included in the North West Relief Road.

After discussion with Highways England, the OLR proposal planned to close the Welshpool Road 'arm' of the Churncote roundabout so that it retained only four 'arms'. However, the current design has increased this to five and this will have significant implications for safety and congestion on this strategic route. Keeping the Welshpool Road arm open also seriously restricts the options for traffic-calming on Welshpool Road. Improving conditions for

sustainable and active travel on Welshpool Road is still said to be a benefit of the proposed NWRR scheme. However, the plans show otherwise, see below p.9 below.

Risk to Shrewsbury's drinking water supply



SC proposes to build a roundabout on top of the inner Source Protection Zone (SPZ1) of Severn Trent Water's public supply borehole at Shelton. The Environment Agency and Severn Trent Water have expressed significant concerns about this proposal and the weakness of SC's risk assessment (Environment Agency [26 April 2021](#), [21 October 2021](#), [3 May 2023](#) and [6 July 2023](#), Severn Trent Water, [5 May 2023](#)). It is clear that SC has failed to adequately satisfy these concerns and that, if it proceeds with the scheme, it will create a significant future liability for itself should any pollution occur to Shrewsbury's water supply.

Damage to veteran trees, woodland and hedges

SC's Trees Team ([8 May 2023](#)), the Environment Agency ([26 April 2021](#)), Shropshire Wildlife Trust ([22 April 2021](#)) and the Woodland Trust ([27 April 2021](#)) have all objected to the proposed NWRR on grounds of the impact to ancient and veteran trees.

The National Planning Policy Framework (NPPF) defines veteran trees as 'A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value'. A large number of veteran trees are identified within the Tree Survey Schedule to the ES. Eleven of these are proposed to be removed, with a further 41 subject to potential damage. Some of these trees are estimated to be 400 to 550 years old.

The Natural England and Forestry Commission [standing advice on ancient woodland and veteran trees](#) provides useful guidance for decision makers who are responsible for major infrastructure projects such as road or rail schemes. The standing advice is clear that decisions on planning applications should be made in line with paragraph 180(c) of the NPPF, as follows:

'180. When determining planning applications, local planning authorities should apply the following principles:

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists;



The 550 year old Darwin Oak in Shelton Rough, scheduled for destruction to make way for the proposed new road

Whilst SC has provided a compensation strategy (SC's Trees team has raised a number of issues about the compensation strategy, especially relating to the amount of woodland to be planted, the funding mechanisms and timescales), SC has completely failed to justify why the proposed NWRR constitutes 'exceptional circumstances' (we have demonstrated the weakness of the 'need' case in previous responses). In particular, SC has failed to justify its decision to upgrade the road from 50 mph to 60 mph which significantly reduced the opportunities to modify the design to avoid loss or damage to veteran trees.

In addition, the development would involve the loss of:

- 34 'moderate-quality' trees removed
- 3.11 ha of semi-natural woodland will be lost
- 4.03 km of hedgerow would be removed
- the ecological value of remaining hedgerows is likely to be reduced due to disturbance from the road and loss of connectivity

- River Severn – ‘temporary’ loss of approximately 130m of riparian habitat per bank during construction (260ms in total).
- Alkmund Park Stream – permanent loss of 66m of HPI (habitats of principle importance) river habitat and riparian corridor.
- Hencott Stream – permanent loss of 30m of HPI river habitat and riparian corridor.

Loss of biodiversity

The Government’s 25 Year Environment Plan, the Environment Act, 2023 and the NPPF require developers to achieve net environmental gain. The Environment Act stipulates a mandatory 10% ‘Biodiversity’ Net gain from development. This is in line with NPPF Policy 118 requirements to achieve “net environmental gain” from development, NPPF Policy 170 “to protect and enhance valued landscapes, sites of biodiversity and geological value and establish coherent ecological networks”, and Policy 175 (d) – “development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity”.

It is clear from the council’s own submission that the proposed scheme fails this test e.g. “The Proposed Scheme has not achieved a qualitative scheme-wide BNG as only five of the ten good practice principles have been achieved”. (Appendix 8.22 Biodiversity Net Gain Assessment). It is arguable whether those five have been really achieved.

There is a significant lag between the loss of existing habitat and the time for newly created habitats to reach target condition. For woodland this ranges between 15 and 32+ years! While this may be considered within the BNG calculation, it is important to realise that in the real world there will be a significant period of habitat loss, along with any ecosystem services that may have been provided. This is especially important given the climate and ecological emergencies and national targets for carbon reductions by 2030 and 2050.

Visual impacts and loss of amenity

In 2018, Knight Architects was commissioned by SC to develop an ‘enhanced design’ for a highway crossing of the River Severn, as part of the Shrewsbury North West Relief Road project, which celebrated Darwin and drew upon the relationship between the man and his origins. The architects’ [website](#) says “A concept design was developed to represent the notion of evolution, with the bridge supports evolving from a simple column to increasingly tall Y-piers, as the height above ground increases. The design also evokes Darwin’s theory of the Tree of Life and offers a distinctive and memorable elevation, visible from afar across the open countryside. The concept design explored a dedicated shared path, protected from the adjacent traffic, with rest points and interpretation of the views towards Shrewsbury. The design was well received by the Project Board, but a decision was taken in December 2019 to progress with a ‘functional structure”.



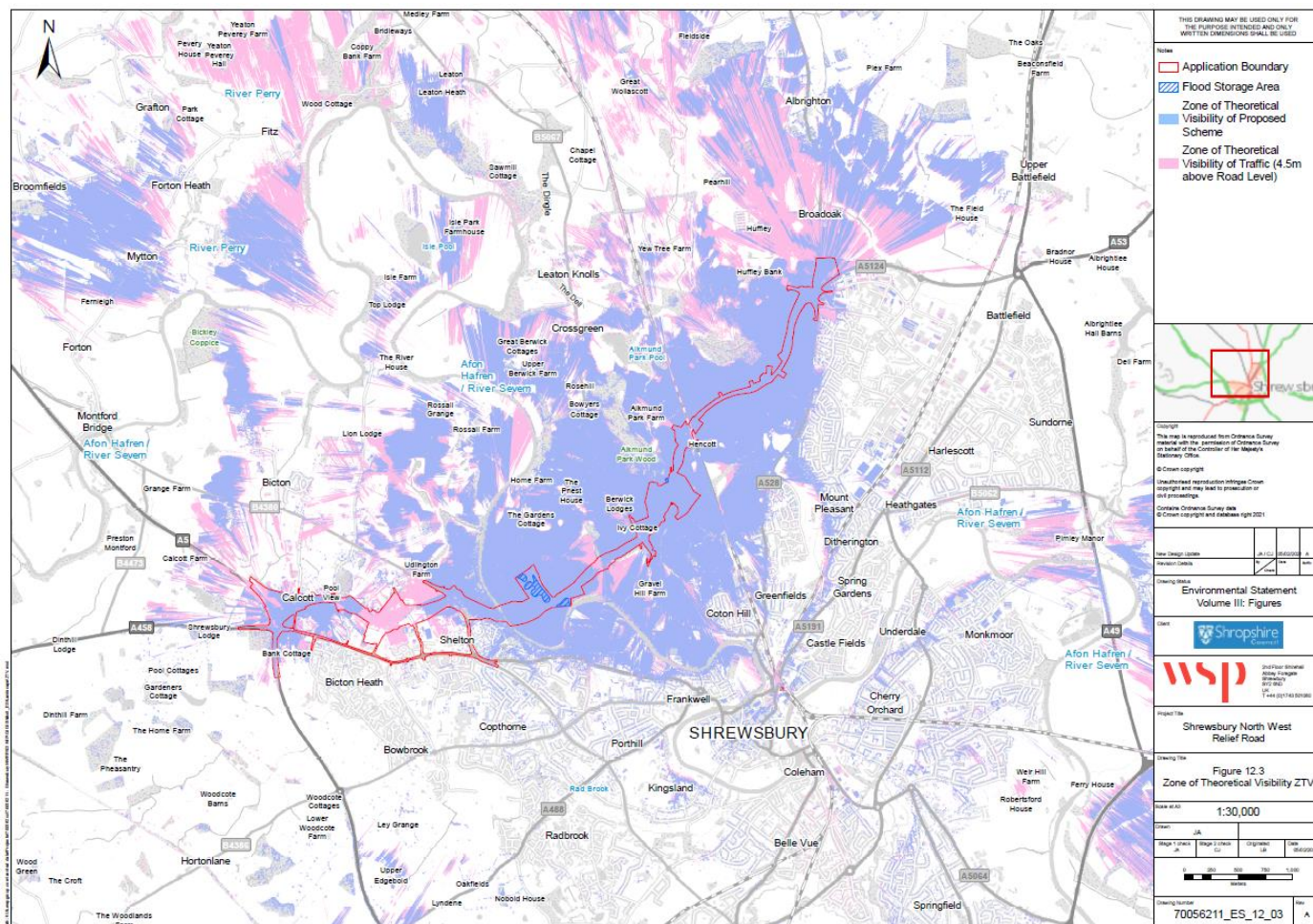
2019 Darwin Bridge Design



BeST’s visualisation of the 2021 ‘Functional’ Design

We have commented in detail previously on the weakness of SC’s visual impact assessment and the significant impact that the euphemistically called ‘functional’ design of the 30 m viaduct will have on a wide area. The figure above shows SC’s assessment of the zone of theoretical visibility of the scheme from which it can be seen that the

scheme will impact a huge area of green space across north and north west Shrewsbury. The lack of any attempt to present the visual impact of this ugly viaduct from a local person's perspective is a major omission from the planning application.



The NPPF states that planning policies and decisions should “identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason”. The proposed development crosses through and will have a major impact on Shrewsbury’s ‘Green Wedge’: this is a “wedge” of countryside connecting the wider rural area to the town centre. The consultants who drew up the Big Town Plan enthused about this as a significant and important feature that contributed to Shrewsbury’s uniqueness – something to be protected. In 1997 Shropshire County Council made the following statement about the likely impact of a new NWR on the Green Wedge

“the most significant quality that this area presents, so close to the heart of Shrewsbury, is its tranquillity. It is this aspect that will be permanently altered, and although noise can be significantly reduced by landscape earthworks, the fact remains that noise will be the major long term intrusion which will change the character of this part of the Green Wedge in perpetuity”

People use the river and banks for recreation and very much appreciate this area which would be destroyed as a tranquil place (and also visually.). It also includes the Severn Way long distance footpath.

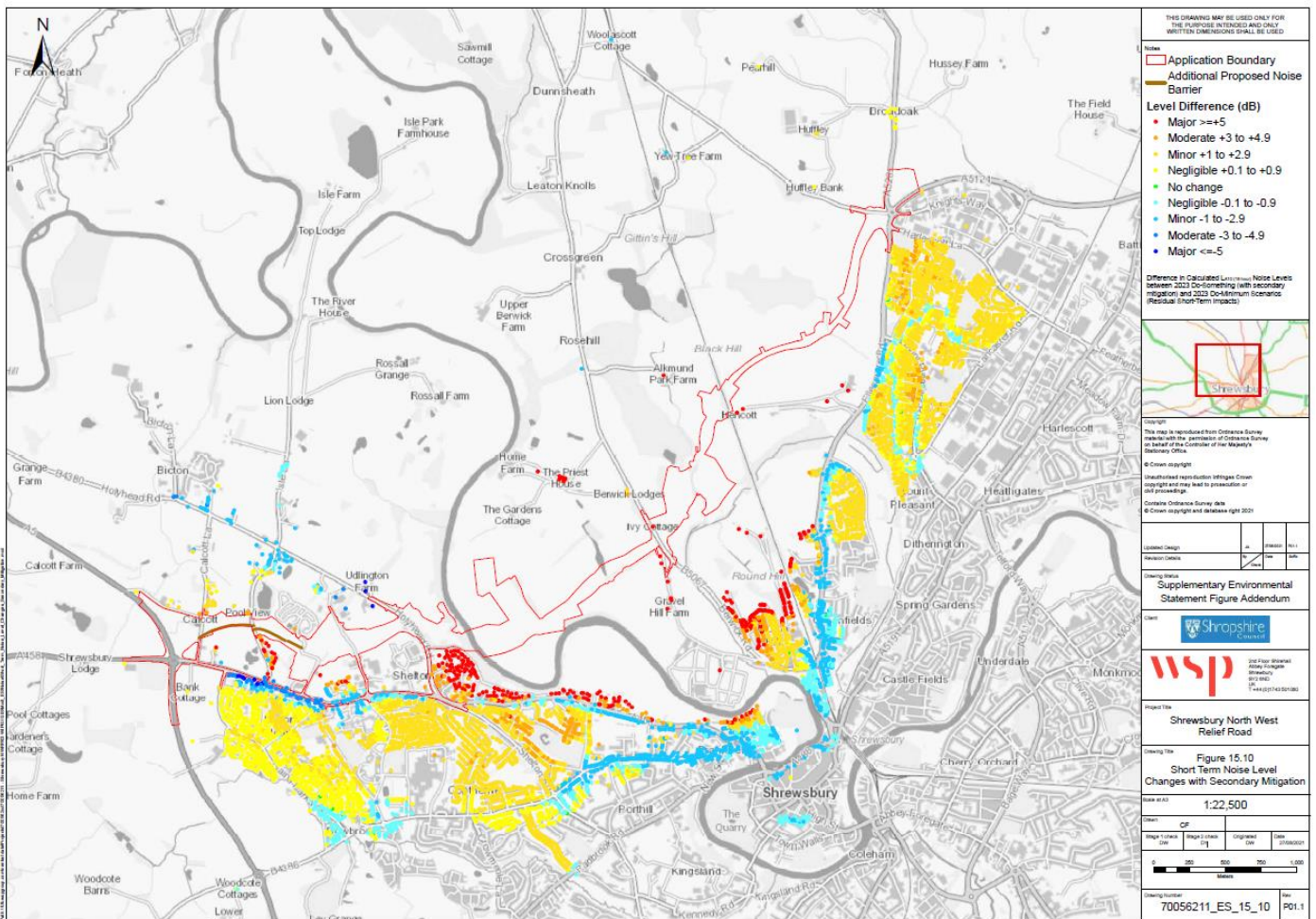
The impact assessment has not considered these impacts on tranquillity in any way.

Noise impacts

The noise impact assessment carried out by SC shows that, based on the traffic modelling that they have carried out, there are far more dwellings that are predicted to experience a ‘major’ increase in noise than a decrease (see Table 15-28 from SC’s Noise and vibration assessment, 2021 below and a map showing the locations of the properties affected). When considering the most significant changes in noise levels, SC attempts to imply that some of the increases can be offset by improvements elsewhere. However, you can’t just offset negative impacts against positive impacts on a one-to-one basis due to the well established psychological effect of [negativity bias](#) which means that the negative impacts of the road on noise levels would be experienced by local people much more keenly than any equivalent positive effect. In addition it should be noted that the noise impacts on new houses which are being/would be built adjoining the road are not included in the assessments.

Table 15-28 – Overall Opening Year residual short term operational traffic noise impacts with secondary mitigation measures

Short Term / Opening Year Mitigated Road Traffic Noise Impact	Number of noise sensitive receptors (Dwellings and other types)	
	Increase in traffic noise level (negative impact)	Decrease in traffic noise level (positive impact)
Negligible	1,571	724
Minor	3,573	951
Moderate	474	54
Major	347	12



Impacts on other road users

We note that, as well as BeST⁴, the following transport groups and organisations representing road users have objected to the planning application for the NWR:

[CYCLING UK NATIONAL](#)

[CYCLING UK SHROPSHIRE CLUB 17 April 2021, appendices](#)

[SUSTAINABLE TRANSPORT SHROPSHIRE](#)

[SHROPSHIRE CLIMATE ACTION PARTNERSHIP TRANSPORT GROUP](#)

[BUS USERS SHROPSHIRE](#)

Railfuture (West Midlands Branch) [27 April 2021](#)

SHROPSHIRE RIDING AND CARRIAGE DRIVING FORUM, [7 May 2021](#), [7 October 2021](#)

THE BRITISH HORSE SOCIETY [17 June 2021](#), [additional information 1](#), [2](#), [7 October 2021](#)

[SHREWSBURY & DISTRICT RIDING CLUB AND THE NESSCLIFFE HILLS & DISTRICT BRIDLEWAY \(27 April 2021\)](#)

[TRANSPORT ACTION GROUP](#)

This indicates that there is a significant level of concern about this application from other road users. In particular, we note that none of the provisions for cyclists in the NWRR design are LTN1/20 compliant and that on several junctions there are no explicit provisions for cyclists. In its application SC⁵ makes the point that at grade roundabouts are dangerous for cyclists and pedestrians but then proposes just such junctions at all the new road intersections, including one that crosses National Cycle Route 81. Ironically, SC justifies its failure to apply LTN1/20 standards on the proposed new viaduct on the grounds that not many people will use it!

Review of Shropshire Council's 'Benefits' Summary (23 August 2023)

This document bears all the signs of having been prepared in haste with limited review: there are errors (reference to the 'Strategy' Road Network), sudden changes in font and repetitions. The title 'proposed benefits' is unusual – this highlights the fact that many of these benefits will only materialise (or be sustainably maintained) if SC takes other steps (e.g. to restrict traffic from moving in to fill up the space created). Again and again measures are referred to with such words as "potential", "opportunities", "enhance", "could be", "seek to" and so on. These words reflect a lack of details, plans, timescales and calculations showing where, how and at what scale any of these "benefits" will be seen and enjoyed by the population of Shrewsbury. SC has no plans or funding in place for this to happen and this means that very few if any of these benefits will materialise.

Reduced Congestion

The benefits presented in SC's recent document largely stem from the estimated travel time savings calculated by the council's traffic modelling. BeST made an extensive critique of this modelling in our original objection statement ([Part I](#)) in 2021 and we note that the Leith Planning Group has also criticised the modelling on behalf of Morris Leisure (Owners of Oxon Caravan Park). Their request for the original modelling data has, as far as we are aware, been refused by SC.

In discussing changes in traffic flows that may occur as a result of building the NWRR, it is important to note that SC's figures compare with/without NWRR settings at future years (2023 and 2038) by which time there is predicted to have been significant traffic growth compared to the baseline at which traffic was actually measured (2017). The reality is that there has been [very little or no traffic growth](#) in the six years since that time which calls into question both SC's assumptions about traffic growth and the claimed reductions in congestion (if there is less traffic then there

⁴ We have previously commented in detail on the inadequacies of the proposed measures for other road users along Welshpool Road and have not repeated those comments here.

⁵ In justifying the removal of a roundabout from the design (between Churncote and Holyhead road) the Applicant says *This is because this roundabout would impede the flow of traffic on the Strategic Road Network and the at-grade option would offer an unsafe method of crossing the Proposed Scheme for non-motorised users and would pose a hazard to motorists.*

is less congestion to reduce). In addition, without taking any steps to constrain traffic from the areas experiencing reductions in congestion, these will quickly fill up with induced traffic.

The traffic modelling presented by Shropshire Council as part of the Planning Application for the NWR indicates that the congestion benefits from the project will be very limited in extent: the greatest reductions (of up to 14% compared to baseline by 2038) are on one route through Shrewsbury. Elsewhere, the NWRR would have:

- No significant reductions on Wyle Cop, High Street, Shoplatch, Castle Hill and Dogpole i.e. the real town centre.
- Very little positive impact on traffic levels on most of the existing outer and inner rings and rural lanes.
- A large negative impact on certain roads, including Berwick Road, Battlefield Link Road, the B4380 at Oxon, and the A5 on either side of the Churncote Roundabout (A458).

The case for the road presented in the planning documents is completely inadequate: there are claims that the road will reduce congestion, but there is no analysis presented as to why and where congestion is a problem in the town or what improvements would count as success. It is therefore impossible to say whether the scheme will achieve its objectives. Overall, the traffic modelling presented doesn't suggest a road system that is currently creaking at the seams and needing such a major intervention, neither does it suggest that the very expensive NWRR is the obvious solution, especially when traffic reduction measures haven't been applied first (as required under the prioritisation set out in LTP3). In fact, the council's [most recent report](#) on traffic in Shrewsbury was in support of the draft Local Plan and this showed significant congestion issues in parts of the town to the south and east that will not benefit from the proposed new road.

Likewise, on reliability, it is assumed that reduced average congestion will improve reliability, but this does not necessarily follow. Reliability is related to the capacity of alternatives if one route becomes blocked and the journey time analysis presented in the report suggests that there are already numerous alternatives for north to west traffic. However, no analysis is presented as to the frequency and location of blockages and the capacity of alternative routes and so the claims that they are inadequate are not grounded in evidence. In the economic analysis presented in the Outline Business Case, improvements in reliability only contribute 3% to the quantified benefits which suggests that the scheme will only have marginal effects on reliability (or that reliability is not currently a significant issue). Significant improvements in reliability for the A49/A5 junction are also claimed without evidence being presented.

Reductions in accidents is also highlighted as a benefit and yet the estimated reduction in fatalities is two over a 60 year period. Data from the government funded Propensity for Cycling GIS tool suggests that implementing a comprehensive cycling network in Shrewsbury could reduce fatalities by two over a four year period – 15 times more effective than the NWRR and at probably 5% of the price. This is the type of evidence that was not available when the applicant last explored alternatives seriously 20 years ago.

The Outline Business Case (OBC) for the NWR is based on traffic modelling that indicates that traffic levels will increase by around 13.5%⁶ by the scheme design date (2038). Under this scenario, the road would have, in places, reached or exceeded its design capacity by this time and require adjustments to meet the demand. If, as seems very likely, the road stimulates large scale, car dependent house building in Shrewsbury's unique [Green Wedge](#), then the road will exceed its design capacity sooner. The road seems to be part of a 'build road, grow traffic, build more road' cycle that needs to be broken if the UK is to have any chance of meeting its stated carbon reduction targets.

Reallocation of road space to sustainable modes

On p.10 of SC's "proposed benefits" document it is stated that there will be an "opportunity" (no commitment) to redistribute road space in this way due to projected traffic reduction in the town centre. To anyone who has followed this project those words add insult to injury. There was a major opportunity and many options to redistribute road space to sustainable modes on Welshpool Road but the scheme as proposed completely fails to do so. There is no extra space for pedestrians. The narrow pavements will not be widened despite the hundreds of new houses meaning that more people will walk on this road; and that many more could do so if they felt safe. There is no extra

⁶ The traffic modelling includes a very small amount of induced traffic (typically around 0.5%): given the road's peri-urban location, the extensive research on induced traffic indicates that this is almost certainly an underestimate. e.g. Sloman et al 2017 found induced traffic in the range 5-10% on a number of similar schemes and this is consistent with the findings of SACTRA 1994.

space for cycling. At the eastern end between Somerby Drive and Shelton there are effectively three lane-widths yet none of that space is being reallocated for cycling.

Given the complete inadequacy of the Welshpool Road plans which are part of the core NWRR proposal – after all this is meant to be a “sustainable urban extension” – why should the mere “opportunity” to act in the town centre be regarded as a positive? Or as giving any hope that there will be action?

It is said that the NWRR “could reduce the journey time for the last 3-4 miles into the town centre making bus travel more attractive”. This is a particularly vague claim as it does not even specify from which direction. Of course, in the absence of more frequent and reliable buses and Sunday services, and in the absence of improved cycle facilities, any reduction in journey time is likely merely to make it more attractive to drive into town.

We are twice told that “the SC Passenger Transport Group Manager has indicated the Proposed Scheme, coupled with other bus priority interventions, could be extremely beneficial for public transport in Shrewsbury”. This officer has only “indicated” their view. The NWRR “could” benefit public transport but only with “other bus priority interventions”.

Air Quality

We note that the 40 microgram/m³ limit used in SC’s impact assessment is not an “objective” but a limit. according to SC figures, the predicted air quality by the railway station will still be above this if the road is built. It is worth noting that the WHO reduced the limit to 10 microgram/m³ in 2021 because of new knowledge on the harm to human health. It is likely that if this were applied across Shrewsbury many more places would be defined as failing air quality standards and the impacts of the NWRR would be judged as significantly more harmful.

Deliverability of the Scheme

The NPPF requires planning permissions to be ‘deliverable’: for housing this is taken as meaning that the houses will be built within five years. We contend that the proposed NWRR is not deliverable and that this, combined with the limited benefits and numerous significant negative impacts means that it should not be granted planning permission.

The funding agreement from DfT says that any increase in the cost of the project will need to be met by SC in full and that the council’s Section 151 officer will need to confirm that the funding is in place to fulfil its contribution. BeST has carried out comparisons between the proposed NWRR and recently commissioned/built road schemes to estimate that the total cost of the scheme will be around £200M (i.e. an increase of more than £100M). We note that in a [recent report to council](#) to Full Council on 21st Sept 2023, a figure of an increase in cost of £95M was accidentally included which validates our own assessment. The report also makes clear that this would need to be funded through borrowing.

Borrowing this amount of money would require £6-7M/year from the council’s revenue budget and, given that SC’s finances have recently been described as ‘parlous’ with the council struggling to deliver existing planned cuts to services, it is not credible to believe that it will be able to find another £6-7M in cuts to fund this road.

On these grounds we conclude that the NWRR is not deliverable and that planning permission should be refused. If planning permission is granted without the road being delivered there is a real risk that developers will use the anticipated appearance of the NWRR to justify house building across north west Shrewsbury (as is already happening) where it is currently restricted in part due to the limited road capacity.

Appendix 1 List of key objectors to the proposed NWRR for Shrewsbury (updated August 2023)

The following organisations have registered objections to the proposed Shrewsbury North West Relief Road on Shropshire Council's Planning Portal⁷:

Key consultees

NATURAL ENGLAND [7 April 2021](#), [7 October 2021](#), [23 March 2023](#), [19 May 2023](#) and [23 June 2023](#)

- ENVIRONMENT AGENCY [26 April 2021](#), [21 October 2021](#), [3 May 2023](#) and [6 July 2023](#)

[SHREWSBURY TOWN COUNCIL](#)

[SHREWSBURY CIVIC SOCIETY](#)

[SHREWSBURY RAMBLERS GROUP](#)

[BICTON PARISH COUNCIL](#) [26 April 2021](#), [11 October 2021](#)

SHROPSHIRE WILDLIFE TRUST [22 April 2021](#), [26 April 2021](#)

Political parties and other Town Councils

[SHREWSBURY AND ATCHAM GREEN PARTY](#)

SHREWSBURY AND ATCHAM LABOUR GROUP has adopted a [policy](#) to formally oppose the building of the new North West Road (NWRR) but has not submitted an objection.

[Shrewsbury and Atcham Liberal Democrats](#)

[Bridgnorth](#), [Ludlow](#) and [Oswestry](#) Town Councils

Business Interests

THE LEITH PLANNING GROUP ON BEHALF OF MORRIS LEISURE [31 March 2021](#), [27 April 2021](#), [App 1](#), [App 2](#), [22 Aug 2021](#)

[SHOOSMITHS LLP ON BEHALF OF EURO GARAGES \(EG\)](#)

[MIDLAND LAND PORTFOLIO LTD \(SUBSIDIARY OF SEVERN TRENT WATER\)](#)

[MARCHES CARE](#)

[EDWARD TATE ON BEHALF OF THE ISLE ESTATE](#)

[URBANISSTA](#) on behalf of Barratt/David Wilson Homes (developer for SWSUE)t

Transport and travel groups

BETTER TRANSPORT SHREWSBURY [Part I](#) and [Part II](#), [Response to WSP letter](#) and [Response to revised application](#)

[CYCLING UK SHROPSHIRE CLUB](#) [17 April 2021](#), [appendices](#)

[CYCLING UK NATIONAL](#)

[SUSTAINABLE TRANSPORT SHROPSHIRE](#)

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[BUS USERS SHROPSHIRE](#)

Railfuture (West Midlands Branch) [27 April 2021](#)

⁷ NB Links to the relevant document have been provided above. However, SC's planning portal is somewhat unreliable and if these links do not work then the relevant hyperlink can be copied and pasted into a browser or the document can be located by searching for the organisation on the documents page of the planning application (<https://pa.shropshire.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=QOXI5QTD06Z00>)

[SHROPSHIRE RIDING AND CARRIAGE DRIVING FORUM, 7 May 2021, 7 October 2021](#)

[THE BRITISH HORSE SOCIETY 17 June 2021, additional information 1, 2, 7 October 2021](#)

[SHREWSBURY & DISTRICT RIDING CLUB AND THE NESSCLIFFE HILLS & DISTRICT BRIDLEWAY \(27 April 2021\)](#)

[TRANSPORT ACTION GROUP](#)

Other environmental groups

[GARDENS TRUST AND SHROPSHIRE PARKS & GARDENS TRUST](#)

[SHROPSHIRE BADGER GROUP](#)

[SHREWSBURY FRIENDS OF THE EARTH](#)

[LONG MYND & DISTRICT BRIDLEWAYS ASSOC](#)

[ANCIENT TREE FORUM](#)

[GREEN SHROPSHIRE XCHANGE \(GSX\)](#)

[WOODLAND TRUST](#)

Potentially significant issues have also been raised by:

[SEVERN TRENT WATER, 5 May 2023](#)

[SHROPSHIRE COUNCIL HIGHWAYS TEAM, 6 July 2021, 2 June 2023 and 2 June 2023](#)

[SHROPSHIRE COUNCIL ECOLOGY TEAM](#)

[SHROPSHIRE COUNCIL TREES TEAM 17 May 2021, 15 October 2021 and 8 May 2023](#)

Most of these issues remain to be addressed by the council.