



# The countryside charity Shropshire

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By email only to:  
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Dear Shropshire Council

**North West Relief Road**

## Introduction and consultation

1. We welcome the opportunity to take part in the consultation about the North West Relief Road, with its deadline extended because of the Covid-19 lock-down. However, the cancellation of the public consultation events in the Darwin Centre meant that many people have not been able to engage fully with the consultation process, including the many interested people who still do not have access to online documents.
2. Also, as far as consultation is concerned:
  - a) One of the Gunning principles of public consultation is that adequate time must be given for consideration and response. The Covid-19 lockdown, with its restrictions to individual freedoms, has undoubtedly brought a new dimension to engagement with Council processes. The extension of the consultation deadline by only 17 days may not therefore be proportionate, because it is not wholly consistent with other decisions made during the Covid-19 lockdown. For instance, it was announced on 6 April that *“given the current circumstances surrounding Covid-19, Shropshire Council has decided to pause decision making on the Local Plan Review process for two months”*. This two-month extension was in addition to an earlier two month delay agreed by Cabinet on 2 February.
  - b) Another of the Gunning principles of public consultation is that consultation must take place when the proposal is still at a formative stage. The consultation documentation confirms that the council is committed to building the road, so the scheme seems no longer to be at a formative stage anyway as far as the council is concerned. Cllr Nutting, in response to a member’s question at the virtual Cabinet meeting on 29 April, said that there would be another, perhaps more important opportunity to comment, when the eventual planning application is lodged. These remarks do indicate that Shropshire Council thinks that consultation at the application stage,

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when the proposals have crystallised, is similar to consultation now, when they are yet at a still-theoretically formative stage. There seems a risk that Shropshire Council, the promoters of the scheme, are driving it through without countenancing any objection.

3. We acknowledge that the general aim of the scheme in Shropshire Council's eyes is to reduce the harmful effects of road traffic. We also understand that the Council's position is that, by diverting through traffic away from the town centre, the scheme may help to get improvements to other forms of transport as envisaged in the Shrewsbury Big Town Plan, and that Shropshire Council is already bidding for grant funding which might provide greener town wide transport initiatives.
4. However, we are concerned that the likely harms caused by the scheme will exceed these possible benefits, as commented on below. Furthermore, the Council is driving this scheme through:
  - a) in the face of evidence that road-building schemes do not achieve the benefits they promise;
  - b) without having yet conducted an independent carbon audit;
  - c) without having yet published evidence of its harm to the environment and to the landscape;
  - d) without having established the Full Business Case for it; the scheme 'Timeline' shows that this won't happen until April 2021, after planning permission has been granted;
  - e) at a minimum stated cost to the Council of nearly £17million (or 20% of budgeted costs); however, the Council is also liable for any over-spend, and as we all know that most government cost estimates are woefully under-cooked, the council could be laying itself open to unspecified monstrous cost over-runs; no amount of optimism for the scheme will be proof against that;
  - f) at a time when a new world might be emerging post-Covid-19; and
  - g) when the Council is both promoter and judge of the scheme, and likely beneficiary of development gains from it; that is hardly conducive to an independent attitude towards the merits and de-merits of the scheme.
5. The 'Timeline' also shows that it is expected that there will be a public inquiry into the scheme. Only at such a public inquiry can there be a serious examination of the impacts of the NWRR.
6. We now comment further on these and other concerns.

### **Road-building schemes do not achieve the benefits they promise**

7. CPRE nationally produced the 2017 report *The end of the road; challenging the road building consensus*. We reproduce its Executive summary at Appendix 1. More than a decade earlier, CPRE had published evidence that challenged the misguided belief that expanding the road network can reduce congestion without ravaging the landscape and wider environment in the process.
8. This 2017 report was itself based on an independent report, *The Impact of Road Projects in England* by consultants at Transport for Quality of Life (TfQL), which drew upon evidence of

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short-term impacts (between one and five years after scheme completion) from over 80 road schemes, published by Highways England through its Post-Opening Project Evaluation (POPE) process.

9. It is always salutary to make a “before” and “after” comparison. The evidence produced by Shropshire Council to support the NWRR scheme is by its very nature only “before” evidence. The evidence from this Highways England POPE process is “after” evidence and therefore grounded in hard reality, rather than optimistic hope and promises.
10. This 2017 TfQL research showed that road schemes:
  - a) induce traffic, that is, generate more traffic – often far above background trends over the longer term;
  - b) lead to permanent and significant environmental and landscape damage; and
  - c) show little evidence of economic benefit to local economies.
11. CPRE is not alone in producing such evidence. Professor Phil Goodwin, a national transport expert, puts the case against roads like the NWRR very well. He says that in 1994 SACTRA, the Standing Advisory Committee on Trunk Road Assessment, published its best-known report, on what it renamed ‘induced’ traffic. The average traffic flow on 151 improved roads was 10.4% higher than forecasts that omitted induced traffic and 16.4% higher than forecast on 85 alternative routes that improvements had been intended to relieve. In a dozen more detailed case studies the measured increase in traffic ranged from 9% to 44% in the short run and 20% to 178% in the longer run. This fitted in with other evidence on elasticities and aggregate data. The conclusion was that an average road scheme, for which traffic growth due to all other factors is forecast correctly, will see an additional [i.e. induced] 10% of base traffic in the short term and 20% in the long term.
12. We are aware that Shropshire Council’s position is that it is committed to building the NWRR, but we remain hopeful that in the new world that might be emerging post-Covid-19, and in the light of its declared Climate Emergency, it might yet re-appraise that commitment. For instance, the AA has predicted a permanent reduction in the demand for travel because people have got used to using home-working technology during the Covid-19 crisis.
13. The Covid-19 situation has demonstrated what a real emergency looks like, and the precedence that such an emergency takes over the economy. As emergencies go, the response to the Climate Emergency looks a pale thing by comparison.
14. Once the Covid-19 situation is under control it will cost millions in Shropshire to repair the economic effects. Now is not the time to be writing a blank cheque for a road building project.

## Climate change

15. Shropshire Council has declared a Climate Emergency yet it is promoting a road that will, on the above analysis, increase traffic and which will therefore also contribute to further greenhouse gas emissions. The public has yet to see any carbon audit in connection with the scheme and so cannot yet make an informed decision on this fundamentally crucial aspect of the NWRR.

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16. One counter-argument to the NWRR is that the money for it would be better spent on green transport initiatives that could be done now, to ease congestion and to create lower emission zones. For instance, York has achieved cycling rates five times higher than Shrewsbury, and Cornwall Council has been very successful at reducing car use by offering attractive public transport alternatives.
17. In its April 2020 report the Natural Capital Committee said that the government should urgently replace biodiversity net gain with environmental net gain, ensuring this applies to all nationally significant infrastructure and the marine environment. Delivery of net zero will become incredibly difficult, if not impossible, without such environmental net gain – it is the only approach that considers the impact on the terrestrial and marine ecosystems, including biocarbon stocks. Planning for infrastructure – including roads, which apply pressure on natural assets – should be fully joined up with any spatial planning for nature based interventions. This will ensure that natural capital is fully embedded in infrastructure decisions. Given the climate emergency there is a stronger than ever case for conserving green space that can provide biodiversity and other benefits.

## Landscape

18. For the record, we draw attention to CPRE Shrewsbury District's Landscape Character Survey of April 2004, which was deposited with the Local Council at the time. Appendix 2 below reproduces the landscape parcels around Shrewsbury and shows the approximate proposed route of the NWRR. On this document Category 1 is landscape which is outstandingly rich in character; Category 5 is the lowest value landscape.
19. It is clear that the NWRR will go through, and cause harm to, landscape of the highest value. This north-west wedge of land around Shrewsbury has not previously been built upon because it is valued open countryside, and flood-prone land in parts.
20. The Environmental Impact Statement (EIA) that will accompany the planning application has presumably been largely prepared already, if the planning application is to meet the 'Timeline' which indicates that it will be submitted in May 2020.
21. It is inevitable, as with all bypasses, that there will be development pressure to build up to the line of the NWRR eventually. Indeed, part of Shropshire Council's reason for wanting to build the road is to release land in its ownership for just such development.
22. The NWRR is therefore part of a larger, but related, scheme of development. The EIA should therefore assess the likely in-combination effects of such associated development as well as the effects of the NWRR itself, including the in-combination effects on the landscape.

## Environment

### Ecology

23. The very recent comments dated 8 April 2020 by SC's Natural Environment Team Leader (Ecology) on application 19/05596/EIA (the Wytheford House free range poultry application) referred to its potential impacts on the Hencott Pool Ramsar Site and SSSI, some 8km away, because of the "Dutch case". If that application is considered to have a possible impact on the European protected Hencott Pool site then the NWRR, which takes only a slight detour near it and still goes close to it, is likely to have completely unacceptable impacts on it. The NWRR is in fact well within the Impact Risk Zone for both Hencott Pool Ramsar and SSSI site

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and the Old River Bed SSSI, although this is not evident on any of the plans provided for this consultation.

24. The forthcoming EIA will have to provide significant evidence to justify passing so close to these sites. What is the point of having protected sites if they can be threatened even by statutory bodies such as Shropshire Council?

#### *Hydro-geology*

25. The forthcoming EIA will also have to provide significant evidence about the hydro-geological consequences of the NWRR, the route of which runs close to the aquifer and to some of the six active wells in use, primarily located in the northwest quadrant of the town, which supply Shrewsbury's water.
26. Again, because the NWRR is effectively part of a longer plan to release land for development, the EIA should consider the in-combination effects on the environment of such possible associated development.

#### *Green network and rights of way*

27. Should the NWRR go ahead it should not cut off any existing rights of way. It should be used as an opportunity to strengthen and, if possible, to extend the rights of way network and to provide attractive cycling routes which are not immediately alongside the NWRR.
28. The need for good countryside access has been highlighted by the current Covid-19 lockdown, which has clearly shown the need for safe routes for people to exercise from their homes.
29. Countryside networks are not used solely by humans. Wildlife corridors and green networks should also not be cut off by the NWRR and if possible should also be strengthened and extended. This might be part of the biodiversity gains that should be built into this scheme in view of the provisions within the current Environment Bill. These will bring in a requirement that the biodiversity value of a development must exceed the pre-development biodiversity value of the onsite habitat by at least 10%. It is to be hoped that Shropshire Council will act within the spirit of this forthcoming legislation and that the forthcoming EIA will set out how this is to be achieved within the scheme.

#### **Traffic effects**

30. Traffic effects are the crux of the rationale for the NWRR. The forthcoming EIA must prove beyond all doubt that the promised improvements in traffic flow can be provided by the NWRR, whilst at the same time it also contributes to reductions in global warming, increases in biodiversity and minimal damage to the landscape.
31. The traffic information that has been provided with the consultation documentation is contained within the "Improvements to Road Network" document. This is fairly minimal and concentrates on average AM and PM peak hours, as though that is all that matters. The assumptions underlying these estimates will need robust justification.
32. For instance, the largest predicted reduction in traffic is on the stretch of the existing bypass which is diametrically the other side of Shrewsbury to the NWRR. This seems unlikely.

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33. Also, some of the predicted increases cannot be ignored. There is predicted to be a 48% increase in traffic on the A5124 between the Ellesmere Roundabout and the Battlefield Roundabout (route 28 on the document). That will undoubtedly add to congestion for travellers onto the Battlefield Roundabout from the A49 or the A53 trying to get either to Shrewsbury or onto the A5/M54. There is already frequent bad congestion at the Battlefield Roundabout, sometimes backing up to the outskirts of Hadnall on the A49.
34. This epitomises one of the weaknesses of some bypasses, particularly single-carriageway bypasses, in that they merely divert traffic from elsewhere, funnel it along the new road and dump it at the end, thereby causing increased congestion at that other end.
35. We repeat that it might be better to spend Shropshire Council's precious money in promoting a reduced reliance on the private motor car. In that regard, the first of the six strategic priorities in the recently published Department for Transport's paper *Decarbonising Transport: Setting the Challenge*, which sets out how it intends to develop a plan to meet the government's target of net zero transport emissions by 2050 is:  
*"Accelerating modal shift to public and active transport: Public transport and active travel to be the natural first choice for daily activities. Cycling and walking to be the obvious choice for short journeys".*

### Deemed consent and speculative development

36. One concern about the NWRR is that Shropshire Council is promoting it partly with a view itself to reap development gains from it. At the Cabinet meeting on 12 February 2020, and again at the Full Council meeting on 27 February, Councillor Nutting said that the Oxon Link Road and the North West Relief Road will release for development the old 100-acre Oxon former smallholdings estate on the outskirts of Shrewsbury. He talked about getting £30 million for it, but his figures did not come from Council officers.
37. Subsequent sums done by us and others indicate that £30 million is probably an unrealistic figure for the net gain to Shropshire Council from such development sales after taking account of developer contributions etc. The net yield might be as little as half of that.
38. Because Shropshire Council is the planning authority that will decide whether to allow the controversial NWRR application the question arises as to whether the reaping of development gains should be part of the balance in the minds of those making, or behind, the decision.
39. Appendix 3 shows the proposed route of the NWRR as it cuts right through the Council's Oxon Estate (in blue).
40. At the very least, if the NWRR is approved it must not become a vehicle for speculative development on currently unallocated land. This is probably more likely at the northern part of the route.
41. The eastern part of the route starting at the Churncote Roundabout already passes through or close to the allocated site of the Western Sustainable Urban Extension and the proposed allocated site SHR216. The impact of the road on people who will eventually be living in

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these developments would have to be carefully managed. That will presumably be set out in the forthcoming EIA.

### On-line questionnaire

42. In terms of the issues discussed above, and on the assumption that this present consultation is taking part at a time when the concept of the NWRR is still at a formative stage, some of the questions in the on-line questionnaire seem limited in scope.
43. We have not completed that questionnaire in case our response should be judged solely on the answers to a computer survey.

### Summary

44. We have severe reservations about the NWRR scheme and Shropshire Council's present position on it because:
  - a) the public are being asked to judge the merits of the scheme before the publication of evidence which is likely to be available only when the full EIA is published at the application stage; this even includes the lack of any published carbon budget, despite the Council's declaration of a climate emergency;
  - b) we need a smarter approach to travel rather than a default "let's build a new road" approach;
  - c) a different world might emerge after the Covid-19 emergency passes;
  - d) Shropshire Council is laying itself open, at a time of budgetary hard times, to writing a blank cheque for any budget overruns, without yet having published a Full Business Case;
  - e) research finds little evidence of economic gain from road schemes, and evidence that they don't reduce traffic;
  - f) the scheme will probably harm the environment and the landscape in a way that cannot be compensated for; and
  - g) there is a risk that the scheme will unleash further development sprawl.
45. We urge Shropshire Council to take stock of these concerns and to re-appraise its approach to the NWRR project.
46. It may be, however, that these issues will be examined openly only at a public inquiry. We therefore anticipate, should Shropshire Council in due course grant itself planning permission for the building of the NWRR, that there will be such a public inquiry.

Yours sincerely

*Charles Green*

*CPRE Shropshire planning spokesman*

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# Executive summary

Road-building is back on the agenda. CPRE set out to examine the assumptions that underpin it.

**W**ith the Government planning to embark on the biggest road-building programme in over a generation, the need for robust evidence-based decision-making is stronger than ever. More than a decade ago, CPRE published evidence that challenged the misguided belief that expanding the road network can reduce congestion without ravaging the landscape and wider environment in the process.<sup>1</sup>

In order to investigate the credibility of the claims being made for the new roads programme, CPRE commissioned consultants at Transport for Quality of Life (TfQL), to produce an independent report.<sup>2</sup> Reviewing over 80 official evaluations of road schemes, as well as carrying out four detailed case studies of older road schemes, this research examined if road-building:

- delivered the congestion relief promised
- damaged the landscape as much as feared
- boosted local economies as hoped

With a much larger body of evidence now available, we have been able to publish an even more authoritative rebuttal of official claims<sup>3</sup> over the benefit of building roads. The new TfQL research shows that road schemes:

- induce traffic, that is, generate more traffic – often far above background trends over the longer term
- lead to permanent and significant environmental and landscape damage
- show little evidence of economic benefit to local economies

The results are particularly damning in terms of economic impacts, for which there was insufficient evidence available to come to conclusions in 2006. Despite a thorough investigation of wider economic data, such as job creation and registration of new businesses, few or no economic benefits from building roads (depending on the scheme in question) were found by the new research.

The findings of this research suggest we need major changes across transport policy and beyond, in particular to:

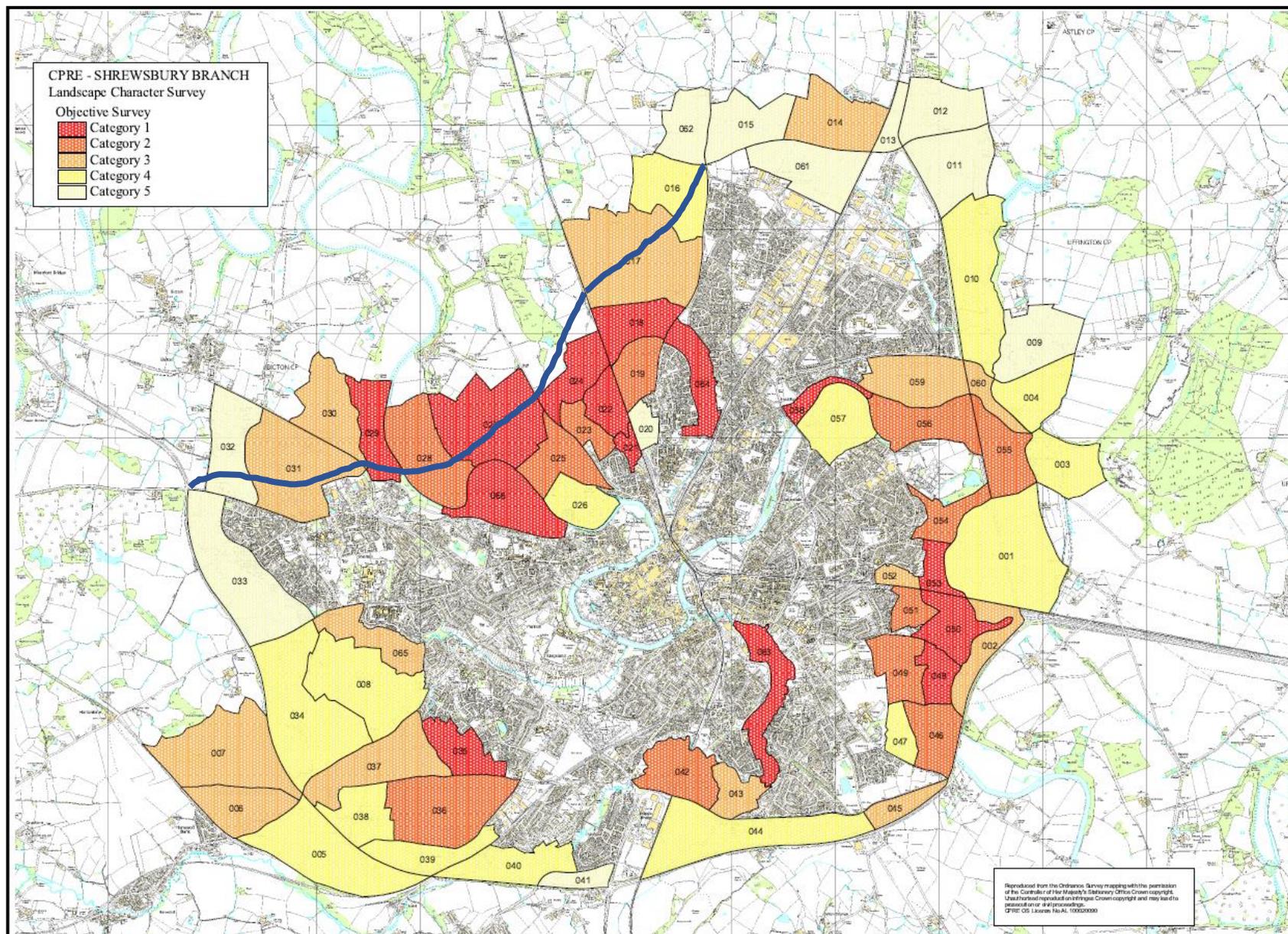
- the model of using road-building to drive economic development
- how we assess road schemes versus other transport options
- how we judge road schemes that have been built and seek to learn from them

If we are to learn from the past, increasing road capacity needs to become the option of last resort rather than the default, as is currently the case. Otherwise we face a dead-end of increasing congestion, needless environmental damage and sprawling development that is as bad for productivity as it is for quality of life. Restructuring our transport system through applying an enlightened 'smarter travel' hierarchy and adopting more efficient patterns of development are urgently needed, if we are to break out of this vicious cycle.

*The Impact of Road Projects in England* by TfQL can be downloaded from CPRE's website: [www.cpre.org.uk](http://www.cpre.org.uk). This summary highlights the key findings and puts them in context.



Page 9 of CPRE Shropshire Landscape Character Survey (April 2004), showing approximate planned route of NWRR, in blue



Proposed route of the NWRR and Shropshire Council's Oxon Estate (in blue)

