

Objecting to the Planning Application for The Shrewsbury North West Road
The Application Reference is - 21/00924/EIA

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Introduction

Anyone can object by one of the methods below. Members of households can each submit their own individual objection.

People compiling their own objections will obviously result in more issues being raised - and there is a wide choice. However a "standard" letter is available.

The different ways of submitting your objection are:-

- Via the Planning Portal on the Shropshire Council website - search using the reference above or follow the link below (Tip – prepare your submission off-line and then copy and paste it – this avoids being “timed out” by the website)

<https://pa.shropshire.gov.uk/online-applications/applicationDetails.do?keyVal=QOXI5QTD06Z00&activeTab=summary>

- Another option is to submit your comment in an email to :- planning.northern@shropshire.gov.uk

- If you are really pressed for time you can go to the BeST website www.bettershrewsburytransport.org where you will find a suggested letter you can use.

However you choose to respond the most important thing is to actually get an objection submitted by the closing date of 27th April 2021.

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Immaterial Considerations

There are a few issues that are not considered when the application is being determined so there is no point including them in your objection.

The main one is cost. Although this has huge implications for the County, and is prominent in our campaign, it is not an issue that is taken into account when a decision is being made on the planning application.

Also you may have personal views on how the council has acted re the scheme and these are not relevant either.

Others closer to home are:-

Loss of value of property

Loss of a view

The impact of construction work (Actually the council are promising measures to minimise this) but the application would not be refused on this issue.

Any point made that is “immaterial” will be ignored but the rest of an objection is still valid so don’t worry too much about these.

The Main Issues

Members of BeST have been looking at some of the 606 documents that make up the application. Draft comments have been prepared and these are attached. We hope they can help you start on your own examination and objection comment. Key points are:-

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Climate Change

The carbon emissions come from both construction and operation. The figure for construction is 70,000tonnes.

A reduction in operational emissions is suggested because of effects on traffic flow and speeds – arising from greater efficiency. The figure for the opening year is 650 tonnes. They then go on to suggest this benefit can be considered up to 2082!!

There are other considerations, and these make the subject complicated, but quite simply this project would add to emissions, there is a climate emergency and any estimates should be looking at the situation from now to 2030 and not 2082.

Because of its contribution to climate change the road should be cancelled.

Traffic

On the evidence provided the proposed NWR would not achieve either the aim of reducing town centre traffic or the aim of increasing resilience for the rest of the local road network. Several roads will actually see more traffic and no means have been provided for locking in any benefits that may result from building the road, apart from on Welshpool Road. There is no evidence given for traffic reductions on the so called rat run lanes to the NW of the town. It is clear that if the road is built further works will be necessary within a few years to cope with the new pinch points created.

More detail is in the attachment.

One point that is applicable to traffic (and noise) considerations is the suggested increase in the amount of development that the council are claiming the road will allow. This is not taken into account but obviously would increase problems.

Rather than building this road Shropshire Council should concentrate on traffic reduction measures that can benefit the whole of the town. The Big Town Plan provides some positive ideas.

Noise and Vibration

Both construction and operation scenarios are considered and much modelling has been done.

It is suggested that a lot of attention would be paid to reducing the nuisance during construction which would require strict compliance by the contractor. This often doesn't happen in practice.

The operation scenario has not been fully addressed.

The effects on properties very close to the route have been modelled but there is no acknowledgement that noise would blight a wide area. Noise will inevitably affect most of the Western Urban Extension at Bicton and that from the viaduct will carry a long distance. Northwest or west winds will carry noise to a large swathe of people living on that side of the town. This is also true of the Berwick Rd – Coton Hill district. Noise affects people in different ways but although it is acknowledged that those who currently enjoy peace and quiet would notice the change the most, there is no acknowledgement of the overall impact. Apart from close to the A5 the route is through areas that are free of significant noise.

Environment/ Biodiversity

Robin Mager, who is very familiar with the ways developers try to suggest their proposals will have minimum impact, has started to look at the 40 relevant documents.

The attached summary is only 1 side of A4 so have a read. You will be well aware of the way HS2 have dealt with this subject on their project – here we have our own little local version!

Shrewsbury's Proposed North West Road

Assessment of Biodiversity issues from the March 2021 Planning Application

Surveys

There have been a significant number of surveys which would seem to cover most of what would be required by the planning process. However the quality to these surveys is somewhat questionable. The dormouse survey was known to be questionable due to poor placement of survey tubes.

Somewhat surprisingly despite surveys split over two years and covering three watercourses, including the River Severn, no field signs of otter were detected. On my one trip to the Shelton area since the application has been lodged I found otter prints in riverside mud!

Surveys for Hare and Hedgehogs have not been undertaken as “the wider availability of habitats for” these species “in the landscape around the Proposed Scheme indicated that specific surveys were not required for the purpose of this assessment”.

Challenging individual surveys will further research but given the examples provided by the dormouse and otter surveys I think they all need to be treated with suspicion.

Biodiversity Net Gain (BNG)

This has been calculated using the Defra metric (i.e. to an agreed methodology) however there is scope for professional opinion in determining the value of habitats assessed.

Even on their own admission they fail to meet all the principles of BNG and fail to meet the desired 10% of measurable gain as “there is a loss of lowland mixed deciduous woodland, wet woodland and especially river habitats which cannot be fully replaced within the landscape mitigation plan”, they forgot to mention the loss of veteran trees (an irreplaceable habitat).

The problem is that the NPPF only asks planners to “identify and pursue opportunities for securing measurable net gains for biodiversity”. Likewise the 10% gain comes from the Environment Bill which has still not made its way through Parliament. There is plenty of wriggle room for Shropshire Council.

The BNG metric is also only applied to the redline boundary of the site so effects related to habitat fragmentation, noise, air quality, etc. beyond this boundary are not included in the calculation. None of the ‘knock on’ or cumulative impacts on biodiversity are considered in the BNG assessment.

This seems to be in line with the guidance provided with the metric.

Summary:

Positive claims:

- reduced nitrogen deposition at some sites (arguable depending on traffic figures, induced traffic, etc.)

- 16.82% net gain in non-irreplaceable area-based habitat units
- 26.09% net gain in hedgerow units.

Negative impacts:

- Increase to the atmospheric nitrogen deposition at Hencott Pool (international site and SSSI). Hencott Pool already suffers levels of nitrogen deposition in excess of the critical load.
- Increased nitrogen deposition on:
 - Alkmund Park Wood ancient woodland;
 - Shelton Rough Local Wildlife Site (LWS);
 - Oxon Pool LWS; and,
 - 27 veteran trees.
- The loss of eight veteran trees
- The loss of a section of Alkmund Park Stream and loss of semi-natural woodland
- Mortality risk for amphibians which could be trapped on the carriageway, a significant effect of minor scale
- Permanent loss of habitat for amphibians, badgers, breeding and wintering birds, otters and terrestrial invertebrates;
- Permanent loss of commuting and foraging habitat for bats; and
- Collision risk for birds and bats
- Clearance of over 10,000 tonnes of vegetation
- No management plans for post development habitats

Even given questions over the validity of surveys and attempts to play down the impacts, the general admission of the documents appears to be one of biodiversity loss and failure to meet BNG principles.

Shrewsbury Water Supply

It is unbelievable that the road runs through the “source protection zones” for our water supply. This is the area at Shelton where water is taken from the ground and the river.

Any contamination of the ground within the zones could result in the boreholes having to be shut down. This has been recognised as a serious threat for years and the Environment Agency and Severn Trent have both been expressing grave concern. Discussions have been ongoing for years as well but the public is mainly unaware of the issue because the Council have constantly played it down.

Now that planning application stage has been reached it will become clear whether the risks can be dealt with to the satisfaction of the EA and ST. Discussions with the Council are not made public but we believe not all issues have been resolved.

A threat to our water supply is such a serious matter that if there isn't a guarantee that it is being safeguarded, then without question the road must not go ahead.

It is a “show stopper” like climate change implications.

Air Quality

It has long been claimed that air quality in the town would be improved if the scheme went ahead.

Central Shrewsbury has an Air Quality Management Zone which has been in place for years. Monitoring has been carried out using diffusion tubes fixed at various locations. They only measure nitrogen dioxide levels.

The place of greatest concern is outside the railway station, near the railway bridge, where the annual mean level is 56micro grams/m³. You can see from Table 6-13 that this is predicted to fall to 44.2 in the year the road would be opened. However, this is still above the legal limit of 40 so building the road does not solve the problem. There is information in the attached which may be a guide for places where you have a particular interest.

Effect on Agriculture

33 hectares of land would be lost under the road of which 25 hectares is "Best and Most Versatile" soil.

This is rated as significant because of the quality of the soil.

- We do hope the above is of help in pointing towards issues that you may wish to raise in your objection. Going through all the documents is a big task but when/if further significant issues are spotted we will be in touch.

You may wish to get on and compile your objection and that is great.

If you do so, but later realise there is more you wish to say, then you can submit further comments. All will be considered.