

Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Better Shrewsbury Transport
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Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text" value="2.31"/>	Policy:	<input type="text"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | |
|--|-------------------------------|---|
| A. Legally compliant | Yes: <input type="checkbox"/> | No: <input checked="" type="checkbox"/> |
| B. Sound | Yes: <input type="checkbox"/> | No: <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: <input type="checkbox"/> | No: <input type="checkbox"/> |
- (Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

See separate sheet

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See separate sheet

(Please continue on a separate sheet if necessary)

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/a

(Please continue on a separate sheet if necessary)

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Office Use Only	Part A Reference:
	Part B Reference:

Signature:

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Date: 25/02/2021

25/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Part B Comments from better Shrewsbury Transport (BeST) on Shropshire Council: Regulation 19: Pre-Submission Draft of the Shropshire Local Plan Feb 2021

This document presents a narrative response to the draft Local Plan from Better Shrewsbury Transport (BeST, www.bettershrewsburytransport.org/who-we-are/). BeST comprises a group of organisations and individuals that is keen to engage positively with Shropshire Council to promote active and sustainable solutions to the town's transport challenges. We are campaigning for urgent action to promote these modes of transport as they are the only effective ways to reduce congestion, poor air quality and road deaths/injuries whilst transforming all our lives for the better. In particular we are calling for the council to immediately halt work on the regressive and damaging Shrewsbury North West Relief Road (NWRR) which is being promoted in the Local Plan.

Whilst, as a group, we are primarily focused on issues of sustainable transport, as described in the recent [RTPI report](#) (Net Zero Transport: the role of spatial planning and place-based solutions, Jan 2021), spatial planning and the transport system need to be considered together in order to put the country onto a pathway to net zero greenhouse gas emissions (net zero). Given the declaration of a climate emergency at national and local levels, this must be a central component of this Local Plan which will cover the major part of the transition to net zero. RTPI, 2021 goes on to say:

The planning system should also prioritise urban renewal that enables growth while achieving a substantial reduction in travel demand. This should focus on maximising the potential for local living by ensuring that most people can access a wide range of services, facilities and public spaces by walking and cycling. Increased home working, digital service delivery, and new forms of flexible work and community spaces will play a key role, alongside investment in place.

The essence of our response is that the draft Local Plan fails to adequately engage with the urgent need to ensure that key planning decisions over the plan life cycle will contribute to the national and local pathway to net zero. With regard to the urgency with which this must be treated we note the following from the recent Environmental Audit Committee [report](#) on Greening the Post COVID Recovery:

The covid-19 crisis must be treated as a wake-up call. It is a symptom of a growing ecological emergency. ... The way in which the UK and other nations respond to the global economic downturn, and the stimulus that national governments direct to recovery efforts, will be pivotal in determining whether the goals of the Convention on Biological Diversity and the Paris Agreement on climate change will be met. Climate scientists advise that a very limited time window is left to slow the build-up of emissions in the atmosphere and thereby limit the increase in global heating to 1.5 degrees Celsius. If the economic recovery from covid-19 is not used as an opportunity to 'grow back better', then climate change and biodiversity collapse may deliver an even greater crisis. There will be no vaccine against runaway climate change

This is particularly the case with respect to the interaction of spatial planning and transport as Shropshire Council has failed to update its Local Transport Plan in time to inform the draft Local Plan. After consideration, we have decided to issue all our comments about this draft of the Local Plan against the 'Spatial Vision' in Para 2.31 of the draft plan as we feel that the admirable objectives described in the vision will not be delivered by the plan as currently set out. In our response to Q5 below we identify the key areas of the plan that need to be improved to achieve this.

Representation Form Part B Q4 – Response for Para 2.31 and associated SP1: The Shropshire Test

The ambition of the stated Spatial Vision (para 2.3.1) is admirable. However, we consider that the plan, as set out in the draft document, will fail to deliver on the key elements of this vision (as set out in SP1: The Shropshire Test):

- a) **Supports the health, well-being and safety of communities;** The plan has selected a higher target for house building than government targets on the misguided assumption that building houses equals growth and this in turn leads to health and happiness. When consulted, the people of Shropshire clearly showed a preference for lower rates of building (according to [CPRE, 2018](#) Shropshire, 88% of Members of the Public and 74% of Town and Parish Councils wanted moderate or lower levels of housing growth) and the plan contains no detail on how these building targets will translate into the objectives of sustainable development or meet the aspiration of the vision nor how building these houses can be part of a pathway to net zero greenhouse gas emissions for the county.
- b) **Supports cohesive communities;** A key requirement for community cohesion is an integrated transport network that does not exclude certain groups. Shropshire Council currently cannot demonstrate that it has taken this into account in the development of this draft Local Plan as the associated Local Transport Plan is completely out of date and a new plan will not be in place until at least Sept 2021. Meanwhile, there is no definition of the term 'right location'. How will this be assessed and measured? The 2018 report [Transport for new homes](#) revealed the deep flaws in the planning system which leave new housing developments with inadequate walking, cycling and public transport connections to surrounding areas. With limited facilities locally, residents are for the most part forced into car-dependency.

In this respect, absorbing housing demand from adjacent urban areas into a largely rural area seems to be completely counter to the need to control car dependent development and map a pathway to a net zero transport system.

The majority of new house building in the draft local plan is located in places that will be car-dependent, have no or poor access to walking, cycling and public transport opportunities and will add carbon emissions as a result of extra car trip generation as a result of site selection that embeds car dependency and lack of options for walking, cycling and bus use in that decision and the lack of joined-up thinking on how to facilitate and provide the infrastructure to support walking, cycling and public transport when new residents move into the new homes.

There is no reference to car-free housing potential and there is no reference to site selection based on trip estimation data by different modes. Data on trip estimation for new housing is available on the [TRICS database](#). It is regrettable and contrary to net zero carbon targets that trip estimation for different locations and configurations of walking, cycling and bus use opportunities have not been factored into locational decisions for new homes.

The Local Plan, if it is to make a contribution to delivering carbon reduction and mapping a pathway to net zero carbon emissions, must define "the right location" and specify the conditions that must be met to reduce car use and increase the use of walking, cycling and buses. It is not acceptable to ignore the impact of car trip generation and its impact on increasing transport's carbon emissions: the plan says that it refers to a climate change strategy but fails to adequately address the largest contributor to carbon emissions in the county (transport) mainly because the local transport plan is completely out of date and a new plan will not be in place until at least Sept 2021.

- c) **Addresses the causes and mitigates the impacts of climate change;** Whilst the need for the Local Plan to proactively map a pathway to a net zero society is not at present explicit in the NPPF, given the national and local declarations of a climate emergency, it is our view that this should be taken as a core part of the definition of sustainable development. The plan needs to recognise the centrality of spatial planning in the transition to a net zero transport system and describe how the planned developments will contribute to this.

A local plan written in 2020 and covering the period up to 2038 against the background of a declaration of a climate emergency, government commitment to achieve net zero carbon emissions by 2050 (with substantial reductions to be achieved by 2030) and against the background of the very serious consequences locally, nationally and globally of failing to deliver carbon reductions, must interrogate every statement and every policy to answer the questions (based on evidence) "by how much will this policy reduce carbon emissions by 2030/50" and "will this policy add to carbon emissions"

If a policy on any subject at all cannot be convincingly related (with evidence) to its outcome measured in terms of carbon reduction it must be amended. If a policy (based on evidence) leads to an increase in carbon, it should not have been there in the first place and must be discarded. In this respect, the following quotation from the Thames Gateway Bridge (2007) Inspector's Report (Inspector: Michael Ellison MA Assistant Inspector: John Watson BSc FIHT MICE MCMI)

*Global warming and climate change. The estimated proportion of all greenhouse gas emissions in the UK that comes from transport varies according to the views of different estimators, but is generally thought to lie in a range between about 21% and about 32%. Private cars account for about 10% of UK carbon dioxide emissions. (9.379) Carbon dioxide reduction from transport is possible to the level required by national policy, but it would require behavioural change. TfL's evidence is that the scheme would result in the emission of an additional 55,000 tonnes of carbon dioxide in 2016. (9.380) TfL respond that this is only an increase of 0.4% across the study area. Even if it were doubled, it would be less than 1%. (9.381) **It seems to me that even a small increase offers no assistance in achieving a reduction to which the Government has made a commitment. (9.382)***

On the other hand, I consider that the proposed TGB would not comply with national planning policy on transport, and it would result in a negative contribution to the Government's commitment to reducing greenhouse gases. (9.427)

Note that the inspector recommended that the TGB should not go ahead.

Following this argument, it is inappropriate for the Local Plan to have exclusions from the requirement to contribute to the net zero pathway on the grounds of economic viability. If a development cannot be economically developed in a way that contributes to the pathway to net zero then it should not go ahead. In our response to Question 5 we have highlighted sections of the plan where such exemptions should be removed.

d) Conserves and enhances the high-quality natural environment and provides opportunities for green and blue networks;

In respect of blue networks, we agree with policy DP19 (water resources and water quality) and point out that the promotion of the Shrewsbury North West Relief Road (NWRR) by Shropshire Council within the Local Plan is inconsistent with Para 3 of this policy as the proposed road includes a major roundabout across the inner Source Protection Zone (SPZ1) of the Shelton Water Supply.

e) Raises design standards and enhances the area's character and historic environment; As discussed above, there should be no exemptions from requirements to comply with measures that contribute to the pathway to net zero greenhouse gas emissions.

f) Makes efficient use of land; and

g) Provides sufficient infrastructure, services, facilities, and where necessary provides opportunities for their enhancement.

The largest council promoted scheme detailed in the plan is the proposed North West Relief Road (DP28 3e and 4.257 and S16.1 7, 10a). A planning application for this scheme has been submitted by the council but the details are not yet available publicly. However, our calculations indicate that the scheme will lead to higher levels of car use and an increase in carbon emissions in the county during the plan period. It is therefore not appropriate for the Local Plan to include the promotion of this scheme.

Representation Form Part 5 Q5 – Response for Para 2.31 and associated SP1: The Shropshire Test

In the Tables below we have highlighted

Para/Policy	Changes required
SP3	<p>Whilst we welcome the inclusion of a specific Climate Change policy, we feel it needs to be much stronger. For example "Climate Emergency" would be a better policy title reflecting Shropshire Council's declaration.</p> <p>Paras 1a-g in SP3 are at variance with established policies of Shropshire Council and its public statements that damage public transport and active travel e.g. its rejection of default 20mph zones at full council in December 2019 when evidence reveals the effectiveness of these lower speed limits in terms of increasing walking and cycling and reducing transport's carbon emissions. Recent years have, in addition, seen reductions in bus funding and there are public statements from the council about demolishing Shrewsbury bus station and destroying a central principle of sustainability in transport which is "integration". Shrewsbury bus station is close enough to the train station to encourage bus and</p>

Para/Policy	Changes required
	<p>train use in combination and this combination (with attractive ticket deals) is a stimulus to modal shift (transferring car trips to public transport) which in turn reduces carbon emissions from the transport sector. The track record of Shropshire Council of neglect and damage to walking, cycling and public transport (including its refusal to develop a Cycling and Walking Infrastructure Plan) is at variance with statements in SP3 and there is nothing in the Local Plan that demonstrates a reversal of these policies and a significant shift in the direction of supporting alternatives to the car.</p> <p>There is nothing in the Local Plan that gives substance to the aspiration of “maximising the ability to make trips by sustainable modes of transport”. It is possible to produce substantial increases in walking, cycling and bus use and the interventions that deliver these increases are well documented e.g. Cornwall County Council’s bus strategy making full use of the Bus Services Act (2017). Cornwall County Council makes sure that buses run seven days a week and that one ticket for all local bus and train services can be purchased. Shropshire Council has not used the provisions of this Act to improve bus services and there is nothing in the Local Plan to indicate that this will be done in the plan period.</p> <p>Our concerns remain that the text makes nothing compulsory. Great words, 'encourage' and 'where possible' and 'promoting' - meaningless unless enforceable and enforced.</p> <p>The aspirations here call into question traffic figures used in the outline business plan for the proposed Shrewsbury North West Relief Road which urgently need re visiting in the light of the COVID pandemic and the climate emergency.</p> <p>1.e. Weak wording, change “encourage” to “ensure”. A site should not be on the list unless it can be linked and integrated and unless it is a condition for development.</p> <p>1.f. The wording is weak as electric charging infrastructure should be provided in all new development.</p> <p>1.g. Fabric energy efficiency should be defined with a minimum figure.</p>
3.31	<p>The Strategy framework is not a strategy - merely an outline of how the strategy will be developed. The Local Plan needs to reference the council’s Climate Change Strategy. However, that document only refers to Shropshire Council’s emissions and it would be more appropriate to reference a document such as the Zero Carbon Shropshire Plan produced through the Shropshire Climate Action Partnership of which Shropshire Council is a contributor. This addresses the totality of direct and indirect emissions from the county and its residents and, in the absence of an up to date local transport plan, could provide some of the headline figures of how transport (and by implication spatial planning) needs to change.</p>
3.31 b.	<p>The implications of this policy have not been followed through into the traffic forecasts that are used in the outline business case for the NWRR.</p> <p>Support for active travel is not in any way linked to adoption of EVs or ULEVs. Driving a car is a sedentary activity and not in any way “active”. Years of sustainable transport research have identified how car ownership produces much increased use of cars (rather unsurprisingly) and reduces walk, cycle and bus use. If people sit inside cars and do not walk or cycle they do not meet public health targets for physical activity and they incur an elevated risk of “non-communicable diseases” including diabetes, obesity and cardio-vascular disease. Getting people out of cars and into non-car alternatives reduces carbon emission and there is nothing in the local plan that will stimulate or promote non-car alternatives. There is a large literature on what is needed by way of infrastructure to support walk, cycle and bus use e.g. excellent segregated cycle paths, joined-up networks to link housing with schools and commonly used destinations and these requirements are not supported or funded in Shropshire. Shropshire Council has refused to adopt 20mph contrary to the advice of the World Health Organisation advice in the Stockholm Declaration (communicated to all national governments) that this increases active travel and modal shift away from cars and towards walking, cycling and bus use.</p> <p>Note the recent Stockholm Declaration</p> <p>https://www.roadsafetysweden.com/about-the-conference/stockholm-declaration/</p> <p>https://www.roadsafetysweden.com/contentassets/b37f0951c837443eb9661668d5be439e/stockholm-declaration-english.pdf</p> <p><i>Focus on speed management, including the strengthening of law enforcement to prevent speeding and mandate a maximum road travel speed of 30 km/h in areas where vulnerable road users and vehicles mix in a frequent and planned manner, except where strong evidence exists that higher speeds are safe, noting that efforts to reduce speed in general will have a beneficial impact on air quality and climate change as well as being vital to reduce road traffic deaths and injuries;</i></p> <p>Wholesale adoption of Electric vehicles on its own is not enough to meet net zero targets and it is a major weakness of the climate change sections of the Local Plan that this fundamental point about</p>

Para/Policy	Changes required
	<p>transport and climate change is missed e.g. this recent report from Lyn Sloman at Transport for Quality of Life</p> <p><i>“Transport is now the UK’s largest source of greenhouse gases. This is the first in a series of papers on what changes are needed in the transport sector if the UK is to deliver its fair share of global carbon reduction. It explains why a switch to electric cars is not enough, and why traffic reduction is also needed. The level of traffic reduction needed by 2030 could be between 20% and 60%, depending on the speed of the switch to electric vehicles.”</i></p> <p>A completely new section should be included in the Local Plan explaining why we must reduce traffic levels (e.g. a 25% reduction in vehicle kms travelled in Shropshire). This is well understood and can be found in UK government reports but is not mentioned in the Local Plan. This government report is from 2005 https://webarchive.nationalarchives.gov.uk/20100304004945/http://www.dft.gov.uk/pgr/sustainable/smarterchoices/ctwwt/</p>
SP5	<p>This could be strengthened by the additional guidance: “should be designed to integrate space for both people and wildlife, reduce carbon emissions and minimise water usage”. High quality design should not compromise sustainability and should incorporate extensive sustainable design features beyond solar.</p>
SP6 para 6 and 7	<p>We welcome the inclusion of Sport’s England’s ‘10 principles of active design’ as a requirement for developments. However, it is not possible for individual developments to contribute properly to well designed walking and cycling routes without there being a high level strategy of where these routes need to be. In this respect, Shropshire Council’s refusal to develop a Local Walking and Cycling Infrastructure Plan (as strongly recommended by central government) will largely negate the potential benefits of this policy.</p>
DPs	<p>All DPs should contain an explicit link to the ways they will assist in achieving net zero carbon. They do not. It is astonishing and unacceptable that DP10 (Tourism and Leisure) fails to recognise the importance of shifting tourism car trips as much as possible to public transport and bikes. This is unacceptable and DPs1-10 inclusive should be re-written to align them with the urgent need to make significant progress towards achieving net zero carbon over the lifetime of the plan.</p>
Policies DP3 - 7	<p>There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield.</p> <p>Playing pitch strategy 2010-2020 states;</p> <p>Building new facilities on new sites is generally a ‘last resort’ approach when all other options have been explored given the capital investment implications. It is only appropriate where there is a lack of provision overall and deficiencies across a number of sports which cannot be fully addressed by implementing the policy options outlined above.</p> <p>In other words not only is there a lack of infrastructure for cycling and pedestrians but also a lack of infrastructure in the design of new facilities including public open spaces that families can actually access.</p>
Policy SP12	<p>We see no obvious reference to addressing business carbon emissions in SP12 - there should be!</p>
SP10	<p>Renewable energy is mentioned in the opening paras but there is no consideration in the plan of how much is required or how this might be achieved. How many solar or wind farms are likely to be required and where would they be best located within the county?</p>
Policy SP10 (5d)	<p>Investment should be prioritised for sustainable transport in appropriate locations, as road transport is a major contributor to the Climate Emergency. This is in line with DfT guidance on a hierarchy of road users.</p>
Para 3.144 and 3.145	<p>Replace “should” with “must” to make this enforceable.</p>
Para 3.161	<p>We welcome reference to the government’s 25 Year Environment Plan but there should be greater reference to this throughout the document, especially in sections SP3, SP4, and SP9.</p>
Policy DP10	<p>Developers should be required to contribute to the upkeep of natural assets to maintain and enhance the tourism offer.</p>

Para/Policy	Changes required
Policy DP10 (f)	The natural environment has been recognised as the major draw for tourists to the county. Retaining and enhancing natural features is therefore key to the long term success of the tourism industry. Stronger wording is recommended.
DP11	This only talks about minimising emissions – not road to net zero. It does not form the basis of a coherent plan for supporting the county's contribution towards the national target of net zero by 2050. It is astonishing that the information in the Local Plan that transport carbon is responsible for 37% of Shropshire's total carbon, transport is not used to support policies that explicitly and tangibly reduce car use. Transport carbon reduction is not mentioned in 1a-1d or sections 2, 3 and 4 Bearing in mind what has happened regularly with affordable housing, this leaves far too much scope for backtracking.
Policy DP11 (1c)	We welcome this but we would like to see a commitment to an increased level of on-site renewable energy sources.
Policy DP11 (2)	We believe large commercial/industrial developments must have the same commitment to providing a percentage of their predicted energy needs through on-site renewable and low carbon sources. See comment on 3.134.
Policy DP11 (4)	Disappointing that when reducing carbon emissions and addressing climate change is balanced against profit, profit wins! We have a climate emergency on our hands and this must be the priority for what happens in the county over the period of this plan.
DP12	The ambition of 10% gain for nature is not ambitious enough; both the Wildlife Trusts and the UN have identified a need for 30% of land to be protected and in recovery for nature. Government proposals are for at least 10% gain, why are we only looking at the minimum figure? Given the role of the natural environment in Shropshire's attractiveness as a place to live, do business and visit, protecting the natural environment needs to be at the core of the Local Plan. The Nature Recovery Strategy is about much more than just Biodiversity Net Gain and thus, it should be a constant theme throughout the plan.
Policy DP12 (4)	Add areas within any future Nature Recovery Network to the list to be assessed.
Policy DP12 (5)	Proposals which are shown to have an adverse effect, directly, indirectly or cumulatively, to those natural assets listed should be refused. Exceptions should only be made in the most exceptional circumstances and there would need to be a clear methodology for how you compare the value of a natural asset to economic or social benefit.
Policy DP14 (4)	Green space should be managed and maintained for at least the lifetime of any development.
Para 4.144	We would question the infeasibility of producing a green infrastructure opportunity map. If this is purely due to a lack of resources, partnership with other organisations should be explored to develop a map. In the NPPF paragraph 174, it is suggested that maps are needed for restoration/creation areas.
DP15	We feel that both quality and quantity are important and perhaps need to be considered more equally.
DP28.	There is no content at all in the Local Plan around "widen travel and transport choices". This is an astonishing omission and vague aspirational statements not backed by tangibility of any kind are worthless. Does the demolition without replacement of Shrewsbury bus station as announced by the leader of the Council contribute to widening transport choices?
4.248	Note that the strategic developments are not located on existing rail infrastructure and so this implies additional road building which is not consistent with the need to address the Climate Emergency
4.249	The hierarchy is a prioritisation tool setting out important principles that will inform overall public policy including the policies of Shropshire Council. The hierarchy is very clear about the most important things (the top 3 lines) and the least important thing, the private car. Shropshire Council has demonstrably reversed this hierarchy in every way possible by proposing to spend up to £37 million on the NWRR and trivial amounts of walking, cycling and buses. It has cut bus funds and now wishes to close the bus station. It is astonishing that the Council quotes the hierarchy when important decisions (20mph and bus station) have ignored the hierarchy.

Q5 Policies that specifically reference the proposed Shrewsbury North West Relief Road (NWRR) and therefore need revision once the promotion of the NWRR is removed from the plan as being inconsistent with the need to map a pathway to net zero greenhouse gas emissions

Para	Implications/response needed
4.257	<p>As discussed above, the business case for the NWRR is built around forecasts of increasing traffic whereas the Climate Emergency and Net Zero CO₂ target require national and local government to adopt policies that will see traffic levels drop steadily over coming years. The business case for the NWRR therefore needs to be completely re assessed in the light of this falling demand. We do not see how the cost of the road can be justified against a poorly stated and quantified case that it will enhance the subregional role of Shrewsbury.</p> <p>Adoption of the NWRR in the plan is contrary to the national objectives of net zero carbon by 2050 i.e. to prioritise “development opportunities” above reducing carbon emissions.</p> <p>It is not acceptable that this reference to the largest capital expenditure on transport ever undertaken by Shropshire Council is not explicitly linked to its impacts on carbon emissions. The NWRR has not yet got planning permission and may be subject to a public inquiry. A Local Plan written in the months following the declaration of a climate emergency must not remain silent on the carbon impacts of NWRR. If it is the view of independent experts that the NWRR will reduce carbon then this must be stated in the Local Plan, with evidence, so we can evaluate the robustness and fitness for purpose of the Local Plan. If it is the view of independent experts that the NWRR will substantially increase carbon emission in 2 ways (1) embodied carbon from the whole life cycle of raw materials, earth disturbance, construction etc and (2) in use carbon associated with the very well documented evidence that “new roads generate new traffic” then this must be stated and fed into a realistic assessment of whether or not Shropshire Council can contribute to the achievement in net zero carbon by any deadline.</p> <p>New roads like the NWRR generate new traffic (additional to current totals) and this increases transport’s carbon emissions. This is well understood and summarised in a UK government report published in 1994: https://bettertransport.org.uk/sites/default/files/trunk-roads-traffic-report.pdf</p> <p>Shropshire Council has confirmed in response to a direct enquiry that, in the absence of an updated Local Transport Plan, the existing plan - LPT3 (which is available on the council’s website) remains the relevant transport plan. This states that it does not envisage that the NWRR will be needed during the lifetime of that plan. The only reason that the NWRR features in the local plan now is because funding has become available – not because it is needed or an essential part of the Local Plan.</p>
S16.1 7)	<p>See comments above about the weak case for the NWRR. This should be omitted from the Local Plan unless a revised business case and carbon assessment shows that it still makes economic and environmental sense.</p> <p>The Shrewsbury Place Plan appears to allow commercial development but not residential in the area west of Ellesmere Rd but this is not clear in the document.</p>
S16.1 10a	<p>The reinforcement and enhancement of the local and strategic highway network: Investment in new roads is not consistent with the Climate Emergency or Net Zero CO₂ target.</p> <p>Shrewsbury Integrated Transport Strategy, the Big Town Plan Movement Strategy and the Shropshire Local Transport Plan: None of these documents are available for the consultation and it is not clear how they support or are supported by the NWRR.</p>
Land west of Ellesmere Road, Shrewsbury (SHR173) p274	<p>This seems to get the green light assuming NW road built – but traffic won’t be included in NWR assessment. This needs to be included as understanding cumulative impacts of developments is essential.</p> <p>Although the presence of an adjacent Local Wildlife Site and nearby SSSI are mentioned in various sections of Sustainability Appraisal text they are not counted in the assessment matrix. Also rather strangely the site scores well in terms of the climate change assessment (bus stop within 480 m) despite the issue of the number of car journeys being generated being of such a scale that the development would be dependent on the proposed NWRR to accommodate the additional traffic.</p>
5.225	<p>See comments above about the need for the traffic implications of SHR173 to be included in the NWRR traffic modelling to assess cumulative impacts.</p>
DP19	<p>We agree with this policy and point out that the promotion of the NWRR in SPZ1 of the Shelton Water Supply within the Local Plan is inconsistent with this.</p>

Para	Implications/response needed
DP22	The construction of the NWRR on an embankment on the floodplain of the River Severn will increase flood risk upstream. This has now changed to construction on columns to reduce this risk (but increase noise and visual intrusion). This aspect was not featured adequately in the public consultation and this will need to be repeated with consequent implications for timing of the scheme.
App 3 DP28 5. Shrewsbury North West Relief Road – Outline Business Case (2017)	As discussed above, the Business Case for the NWRR needs to be substantially re worked compared to the Outline Business Case to take into account falling rather than growing levels of traffic.