

1. Introduction

Bicton Parish Council (BPC) wish to object to the proposed NWRR. The following outlines their concerns for both the short-term and long-term impact on Bicton parish of such a major road development which will effectively split the parish, create significant noise and bring increased air pollution to our rural village.

The consultation documentation is overwhelming in volume and has a fatal lack of an overview with mapping of relationships, or, at first approach, order and classification of documentation. This made it extremely difficult to identify all important documents and summaries. Many documents have not been reviewed with only those with obvious relevance to the existing environment read. Items of significant concern may therefore have been missed.

2. Limitations of review.

Only documents within the planning application have been used as source information with the exception of the Flora of Shropshire by Lockton and Whild.

All documents have stated limitations and these have been accepted without comment and not checked for omissions.

This review, unless otherwise stated only considers Bicton Parish.

3. Funding and need for the road?

- a) The business case for the NWRR was made before the Covid pandemic and needs reconsideration in the light of this and associated economic and societal changes arising from it. The open-ended commitment to funding any over-run is a significant concern for all Shropshire residents as is the question as to whether the road is needed and whether it is the best use for public funds. Paragraph 2.1.2 of the Statement of Community Involvement document makes it clear that Shropshire Council accepts capital costs of nearly £17m based on current estimates and furthermore will accept any over-run costs. At paragraph 10.9.8. it is stated that there will be a very high level of cost certainty because of the type of contract to be used. Any attempt to build in cost certainty from the outset is likely to lead to an increased price to cover the acceptance of risk and so it seems highly likely that the impact on Shropshire Council will be greater than £17m. Given the pressure on council funding which will undoubtedly increase still further because of the need to repay the cost of the Covid pandemic this increased use of Shropshire revenue for an underfunded central capital project seems imprudent if revenue for public services is to be maintained. It ought to be made clear how any increase in contribution will be covered so that any consequential impact on other services will be obvious before final approval for the road is sought.
- b) Is this road really necessary in the light of recent changes in life arising from the pandemic? Shropshire Council proudly announced on 18 March 2021 that lockdown has cut emissions by 7% and that 39% of employers expect to continue to work remotely. They continued that 1 in 4 (25%) people expect to continue remote working as long as targets are met. Use of Shropshire Rights of Way is up 131%! Surely figures such as these would indicate that there will be significantly less traffic on the roads in the future and hence negate the need for such an adverse impact on our local environment. To protect our environment for the future generations is paramount. Hereford Council have recently scrapped a similar scheme and invested in public transport and services so why is it that Shropshire Council still feel that it is right to forge ahead with a solution that might have been appropriate 20 years ago but feels inappropriate now.
- c) The modifications in planning that have resulted in the present scheme, particularly around environmental concerns are detailed in Chapter 4 Consideration of Alternatives https://pa.shropshire.gov.uk/online-applications/files/E2109A02082FD7571831301BBA84FB50/pdf/21_00924_EIA-CONSIDERATION_OF_ALTERNATIVES-4171925.pdf . Enhanced major mitigation of much environmental impact e.g. noise beyond what is currently incorporated in plans is not easily possible on the current route so the planning decision depends on an assessment of the benefits of the road and its necessity over the irrevocable environmental disadvantages.

- d) The traffic assumptions and modelling underlying the planning application have been criticised independently by the Leith Planning Group (https://pa.shropshire.gov.uk/online-applications/files/213A3A609E13E1EC9F70C9071B028558/pdf/21_00924_EIA-THE_LEITH_PLANNING_GROUP-4212881.pdf) and publication of the modelling and independent verification of Planning Group's critique is necessary as their findings seem very credible and entirely damage the provision made in the Planning Application. Statements of uncertainty about traffic modelling are required analogous to those required by national accreditation schemes and not only mean a need for 24 hour traffic flows but an analysis of flows during the 24 hour period are also required to assess peak flows.

4. Churncote roundabout

A key component of the new route will be the Churncote Roundabout. The changes described are suggested to be improvements and whilst that might be the case when viewed through a computer model the reality is likely to be quite different for the following reasons:

- a) Currently entering the roundabout from the Welshpool Rd travelling west can be very difficult and risky given poor visibility across the roundabout and to the northbound A5. The fact that traffic joining from the Welshpool Rd travelling east and the A5 travelling south have priority and are typically travelling quite fast adds to the risk. Adding a third major route onto the roundabout which will have priority is likely to make the access from Welshpool Rd even more dangerous and could lead to lengthy queues given the probability of increased traffic from the planned housing developments on the Welshpool Rd.
- b) Paragraph 6.1.4 of the Transport Assessment states that pedestrian connectivity has been maintained at the new roundabout. Whilst that is undeniable it certainly could not be claimed to be safe. Currently it is very difficult to cross the road with only two lanes joining the roundabout from the A5. The increase to three lanes is likely to mean that people simply won't be able to negotiate the roundabout safely on foot.
- c) Other roundabouts of a similar size on the A5 are traffic-light controlled. Without such controls in place at the enlarged roundabout it seems likely that there could be long queues at peak time from any direction and consequential risks in getting onto the roundabout safely.
- d) The potential for queues to join the Churncote roundabout when travelling west on Welshpool Rd may cause drivers to use Gains Park Way to access the A5 via Mytton Oak Road. How will residents of Gains Park be protected from the potential for an unacceptable increase in traffic through a residential area and how will hospital access be conserved?
- e) The potential for a new Petrol Filling Station (PFS) by the roundabout raises concerns of traffic issues as traffic turns left from the roundabout onto the Welshpool Rd and meets the queue of traffic trying to turn right into the PFS. The increased size of the roundabout and extra volume of traffic will undoubtedly add to the probability of issues in the future so will the Churncote roundabout still work as effectively as predicted if the PFS is built?

5. Footways, bridleways and cycleways

BPC recognises that there have been changes to the plans that are considered to be improvements to the original plans e.g. the footbridge to the east of Shepherds Lane but there are still some concerns about this aspect of the plans as follows:

- a) One concern is that cyclists and pedestrians will be sharing the same space. Given the lack of traffic and a good surface it is likely that cyclists will be able to approach pedestrians at speed and often from behind which is likely to put pedestrians, particularly children at risk. It is accepted that there ought to be sufficient space for the two types of users to co-exist safely but it is thought that some form of separation to safeguard pedestrians and cyclists from collisions and injury should be considered.
- b) On general arrangement sheet 7 of 32 it looks as though footpath 0408/13/1 is unlikely to be usable safely as it appears to lead to point on the road where there is no safe crossing. There is recognition of a short-term closure during the obstruction phase with a major impact but in the operational period it is suggested the impact is minor, presumably because of a short diversion, but exactly how that will be achieved is not clear.

- c) Throughout the pandemic walking around the lanes and footpaths in the parish has increased noticeably. It seems likely that as a result of this new road less people will walk the PROW throughout the parish because of the considerable increase in noise and pollution. This seems contrary to the drive to get people exercising more and could lead to a worsening of general health and wellbeing for residents.
- d) The maintenance of the exit of Featherbed Lane onto the Bicton side of the Holyhead Road is essential for walkers from Bicton. The proposed forking off Featherbed lane to an underpass (Landscaping Plan 13 of 32) under the NWRR and through this to Shelton Lane for shared equestrian, cyclist and walkers does not seem safe for a number of reasons. The Z shaped nature of the diversion means there is no clear line of sight for users through the underpass from a distance and as this tunnel is to be unlit outside daytime, this asks for it to be an area where assaults, rough sleeping or even accidents involving horses and pedestrians or cyclists may become likely. Straightening access to the tunnel to allow clear line of sight is essential and widening it and lighting needs to be reconsidered. The need for equestrian access into Shrewsbury itself and onto The Mount is doubtful to say the least.
- e) The Shepherd's Lane proposed footbridge which is in close proximity to the Grade II listed Oxon Hall reaches a height of 8 metres. There is no plan in place to protect the privacy of the nearby houses which will be adversely affected by the bridge.
- f) The provision of pedestrian access across the viaduct may not be safe as it is not separated from the road by barriers. The length of the viaduct raises the question whether this footway is necessary or desirable.

6. Welshpool Road

Whilst the planned improvements to the Welshpool Rd could generally be considered to be positive there are a few aspects of concern as follows:

- a) It is proposed that a 'Give Way Build Out' will be created just to the east of Shepherds Lane. It is already quite difficult to turn left because of poor visibility and very difficult to turn right. Adding the build out could lead to queues across the end of Shepherds Lane which will make the junction even more difficult. Consideration ought to be given to removing the build out or at least moving it so that it won't impact on the exit from Shepherds Lane.
- b) It is unclear if there will be warning signs for the raised "table-tops". If they are to be as high as some around Shrewsbury even crossing them at 20mph could cause damage to cars and potentially cause loss of control. Warning signs or clear markings on the road ought to be present and the height of the table-top should be such that the risk of damage or accidents is removed.
- c) It is not clear how the removal of the left turn lane when joining the B4380 from Welshpool Rd can be considered a beneficial change as it will surely lead to longer queues on Welshpool Rd and not provide any benefit?

7. Disruption for Bicton Parish

The application does reference other committed developments but gives no indication of whether there will be any joined up planning to manage the impact of significant developments taking place simultaneously across Bicton parish. This apparent lack of an overarching plan gives rise to the following concerns. BPC feels there needs to be greater clarity about how access to and from Bicton will be protected so that the disruption throughout the life of the project and thereafter doesn't become unacceptable.

- a) Bicton Parish is likely to have three major developments in progress at the same time i.e. The Coppice extension, the Welshpool Rd housing development and the NWRR all of which will impact on the main routes from Bicton to Shrewsbury and south onto the A5 for an extended period. All will have a negative impact on the ease of access to Bicton and whilst individually that impact might be manageable there are concerns that without a co-ordinated plan the impact could become intolerable.
- b) A key concern for disruption to Bicton parish is the creation of 3 site accesses in the parish as described in table 2.1 on page 26 of the Population and Health document. It describes the creation of 3 site accesses at the A5 Churncote roundabout, Holyhead Rd (both sides) and Clayton Way which all

seem significant for Bicton and are likely to lead to significant disruption for the duration of the project.

- c) Throughout construction there will be significant disruption to residents of Bicton parish both for road traffic and non-motorised users of the PROWs and the local lanes and roads due to the proposed working hours of 7 a.m. to 7 p.m. Mitigation plans are not clear and so it is not possible to fully assess the impact on Bicton or the duration of that impact but the potential for a period of disruption of at least two years is likely to have a very significant impact on individuals in this parish.
- d) Another key concern about disruption whilst in the development phase is the construction of the 'haul roads' which are amongst the first things to be created in months 2 to 3. There is to be a 'haul road' from the Churncote roundabout to Clayton Way. It is assumed that this 'haul road' will cross Calcott Lane, Shepherds Lane and PROWs 0408/7/1 and 0408/13/1 which could therefore lead to an extended period of disruption on moving around the parish.
- e) Even once operational, residents of Bicton will continue to experience a continuing adverse impact from the development in that the main route in and out of Bicton along the B4380 will now be busier, particularly in the area of the new B4380 roundabout. An improvement in driver stress is predicted once operational and whilst that is no doubt true for Shrewsbury town centre it seems an unlikely outcome for Bicton parish residents.

8. Holyhead road, new roundabout and the viaduct

The activity planned around the new Holyhead Rd roundabout is a particular concern for Bicton parish residents given the potential disruption throughout the development of the project and thereafter throughout the whole time in operation as this will become the only route in and out of Bicton.

- a) General Arrangement sheet 12 of 32 shows that the alignment of the B4380 is to be adjusted so that it is slightly to the north of the existing road only re-joining the current layout on the approach to The Coppice. As this is likely to be the only route to and from Bicton how will access to Bicton be protected given that once works starts on the new roundabout and on the realignment of the road passage to and from Bicton is very likely to be hindered and possibly even closed for periods?
- b) On General Arrangement sheet 11 of 32 it shows there will be a crawler lane over the viaduct which culminates at the new roundabout on the B4380. A queue of slow traffic could make it very difficult for anyone turning left to get into the correct lane safely. Similarly slow traffic may find it difficult to get into the correct lane if they want to turn right. There seems to be a high probability that drivers will want to cross over each other on entry to the roundabout when southbound with the associated risk of collision so an improved approach that facilitates people getting into the correct lane should be considered.
- c) Satnavs will undoubtedly show drivers that the Holyhead Road between the new Holyhead Road roundabout on the NWRR and the Montford Bridge turning on the A5 is a short cut bypassing the Churncote roundabout. This will particularly be a problem with northbound traffic on the Holyhead Road and southbound traffic coming off the A5 at the Montford Bridge turning. Further, the closure of Calcott Lane and Shepherds Lane which offered access to the Welshpool Road and A5 will also increase traffic on the Holyhead Road. The plans suggest this increase in traffic will not be a reality but what urgent steps to increase the safety of the Holyhead Rd will be taken to ensure that it does not become an issue if there is an increase in traffic rather than the predicted decrease? Given that the grounds for a prediction of decreased traffic are obscure, why are measures not in place in this planning application to stop Holyhead Road or indeed Preston Montford Lane becoming short-cuts?
- d) There is the potential for accidents on the A5 to increase the traffic on the Holyhead Rd if a diversion is needed and the potential for an accident on the Holyhead Rd to completely block access to Bicton without a significant diversion. Has the risk that accidents on either road could lead to lengthy delays and possibly even prevent emergency vehicles being able to get to and from Bicton been considered?
- e) The drawing shown on Sheet 1 suggested that the foundation design for the viaduct is subject to review and amendment/clearance with Severn Trent Water (STW). However, there are no documents available suggesting that STW are happy to proceed? Has that review been satisfactorily completed?

9. Transport

It is difficult to assess how valid the statistics are in the Transport Assessment given the very technical nature of the modelling but there are a few areas of concerns as follows:

- a) A 26% reduction in peak traffic along the Welshpool Rd is predicted. Does that estimate allow for the inevitable increases in traffic arising from the SWSUE development as if not at best it will be a short-lived reduction and at worst there will be no reduction at all.
- b) The only route out of Bicton to the east, north and south will become the B4380. For most of the length from the A5 to the NWRR reductions in traffic are predicted but from the NWRR a significant increase in traffic is predicted. It seems very odd that the increase in traffic is only predicted to persist for a couple of roundabouts on the B4380 and not impact on roads like The Mount. It seems inconceivable that a predicted increase of traffic of 132% on the B4380 between the NWRR and Welshpool Rd will not have a far wider impact than the statistics suggests and in particular will increase all journey times into or out of Bicton.
- c) Do the statistics allow for the fact that new roads typically lead to more development and therefore even more traffic? If not any beneficial impact is likely to be very short lived with the result that Shrewsbury town centre will be experiencing traffic on the same scale as today very quickly thus completely undermining achievement of one of the key objectives of the NWRR.
- d) The statistics imply that most of the traffic from the south and west is travelling directly to the north of Shrewsbury and not to the town centre. If that proves not to be the case there will be a significant impact on which traffic will follow which route with the result that usage of the NWRR might fall far short of the usage required to meet the perceived benefits.
- e) Given the potential for an increase in traffic on Holyhead Road if drivers do use it as a short cut what safety measures will be taken to ensure that the road which is already dangerous to cross in some areas e.g. by The Coppice will not become even more dangerous for residents?

10. Environmental Impact

At paragraph 4.2.74 of the Planning Statement it states there will be a net gain in biodiversity as a result of the NWRR. At paragraph 16.10.20 of the Environmental Statement Volume 1 it states there is expected to be a slight beneficial effect on Bicton. It is felt those conclusions misrepresent the true impact on Bicton as outlined in the following observations.

- a) **Noise (Chapter 15 Noise and Vibration - https://pa.shropshire.gov.uk/online-applications/files/3B680F02543B9FFF20046ADC28652A50/pdf/21_00924_EIA-NOISE_AND_VIBRATION-4172162.pdf)**

In the section between the new Churncote and Holyhead Road roundabouts the road passes through an area already built up on both sides of the proposed route and a designated urban extension subject to further planning permission. Existing long term residential and nursing home care facilities where residents may be incapable of objection are affected. A significant frontage of the Uplands Nursing home is to be acquired and the nature of noise reduction measures required in the home is as yet unclear. The road passes close to it and it will cease to be a rural environment. The Coppice will be very close (35m) to the road and a new development of sheltered buildings close to the road is planned. The planning application for this stated that sealed glazing that will not open will be required for this new accommodation as a noise reduction measure. The effect on the rest of the Coppice accommodation does not seem to have been assessed but is likely to be considerable. The Coppice intervenes between the Road and the Severn Hospice., but the latter's necessary peace will be adversely affected by noise. The provision for scour protection on the Oxon ditch will bring the road within 145m of Oxon Hall and although screened by some hedgerows noise from the south will destroy the rural nature of this site. Although there is an assessment of the adverse noise of construction on some properties near to the road. key multioccupancy properties are missing from the assessment and there is not a similar written assessment, property by property, of the longer term (operational) noise generated by the scheme. However, mapped properties suggest that 4 Calcott Lane and 17 Shepherds Lane properties will suffer long-term major(>10 decibel) effects and additional moderate effects (5-9.9 decibels) will be suffered by respectively 3 and 10 more properties and Oxon Hall (https://pa.shropshire.gov.uk/online-applications/files/F29CFF592DA7892463487DDA7021AC51/pdf/21_00924_EIA-LONG_TERM_NOISE_LEVEL_CHANGES-4172165.pdf).

b) Air Pollution (ES CHAPTER 6 Air Quality – https://pa.shropshire.gov.uk/online-applications/files/314CBF748A4A072A1E2E06458861D564/pdf/21_00924_EIA-AIR_QUALITY-4171923.pdf)

The technical evaluation of air pollution suggests a considerable rise in dust pollution during construction phases as in excess 100,000 tons of earth and surface materials are moved. Some mitigation is proposed. Tracking out of dust will affect this parish particularly. Once the road is operational there will be a rise in Nitrogen Dioxide levels in the vicinity of the road assuming traffic moves from the town centre to the NWRR as envisaged. Nitrogen dioxide deposition in the Oxon Pool is estimated to affect 32% of the area of the site. This could increase the risk of eutrophication and weed, damaging angling. The Biodiversity document (Chapter 8 Biodiversity https://pa.shropshire.gov.uk/online-applications/files/30923B40373EA9977AB3657E34F03F83/pdf/21_00924_EIA-BIODIVERSITY-4172043.pdf) states this will be minor as will such deposition on Shelton Rough Wildlife Site and on 27 veteran trees in the Application boundary. Levels in Coton Hill in particular within Shrewsbury town centre will accordingly fall on these proposals. Levels at the roads around the station will still remain above recommended levels and action will still be required to limit traffic here or other measures. It is not envisaged levels will rise above recommended maxima along the course of the new road. Falls in emissions due to change in traffic flows are estimated as 5-15% in Shrewsbury town. No evaluation has been made of changes from fossil fuel to electric vehicles within 12 years of the construction of the NWRR on nitrogen dioxide levels. The improvement in urban air quality cannot therefore be considered as a material reason for spreading pollution over a wider area, although electric vehicle roll-out may reduce this level to a material extent. During construction, the large amount of vehicular traffic will raise air pollution with Nitrogen Dioxide in the parish but the extent of this rise has not been assessed but is likely to be large. No mitigation has been proposed for this. Dust issues during construction are a serious issue and mitigation will be limited in effectiveness.

c) Light pollution

This can arise from fixed lighting especially if light standards are high level and measures are not taken to reduce the number of lights or are unshielded permitting upwards light diffusion. It can also arise from traffic headlights. The proposal is for dense lighting on top of 8-12 m galvanised poles at roundabouts and bridges and only some will be shielded. The requirement to light the footway there has been absorbed in the general lighting of the carriageway and no systematic lighting is proposed for the rest of the footway along the length of the road. It can be argued that footway low level lighting and less carriageway lighting would be advantageous. Excessive lighting of junctions is envisaged and should be reduced to the minimum. Headlights from cars will disturb many adjacent properties and a 2m fence may not adequately address this with higher shrub screening being desirable. Light pollution will deleteriously affect many species of wildlife from bats and owls to moths and micro moths all of which are damaged. The proposal includes no reference to the nearby Preston Montford headquarters of the National Field Studies Council nor to the fact that moth species and numbers recorded here are at the highest level in England and the habitat across the length of the road will be damaged in this respect

d) Drainage / watercourses etc.

It isn't clear that the plans have considered the full impact on drainage given the other planned developments in the area or that sensitive sites will be protected. This gives rise to the following concerns about drainage:

- i. The Welshpool Road housing development (SWSUE) plan includes a drainage scheme which is planned to be on both sides of the NWRR. Will that drainage scheme for the houses be effective given that at this point the road will be in a cutting and so drainage to the north of the road might not be as effective as required to deal with water running off from the new development.
- ii. In the Description of Development document the high level strategy for drainage mentions drainage into three attenuation basins all of which ultimately flow into Bicton Brook as does water from a wide area on the Welshpool side of the A5, Gains Park and the high ground of Grange bank. New development in the SWSUE with impermeable surfaces will increase water flows as well, The A5, Calcott and Oxon ditches will all be intersected by the NWRR, interrupting some of this

- drainage. A lot more water seems likely to flow through the brook which goes close to the primary school, some properties and public areas in Bicton. Given recent flooding events on Calcott Lane, which seem to be occurring more frequently, has it been proven that Bicton Brook, particularly where it goes through a narrow culvert under Bicton Lane near the church, will be able to cope with the additional water or any chemical spillage from a tanker on the new NWRR
- iii. There are concerns regarding Oxon Pool and the risk of pollution caused by run-off from embankments. WSP findings are not conclusive that pollution will not take place. As this pool is a recognised Wildlife Site and fishery, greater clarity about how it can be protected is needed.
 - iv. Does the proposed road as it goes to the north of the Severn Trent offices affect the local boreholes? There is insufficient detail in the planning application to confirm what is going to happen to those boreholes and whether what is planned will pose a threat to Shrewsbury's water supply. More clarity of how any risk will be mitigated should be available before approval of this application is considered.
 - v. On Shepherds Lane there is a proposed carrier drain or piped culvert in the vicinity of 1 Pool View. Going forwards who will be responsible for monitoring this?

e) Natural environment

The limitations in labelling make a comprehensive assessment of environmental impact and effectiveness of mitigation measures difficult. The comments below relate not only to individual documents but also the misleadingly labelled but very important document Chapter 8 Biodiversity (https://pa.shropshire.gov.uk/online-applications/files/30923B40373EA9977AB3657E34F03F83/pdf/21_00924_EIA-BIODIVERSITY-4172043.pdf).

- i. **Woodland and trees** (Chapter 8 Appendix 8.20 Arboricultural impact assessment (https://pa.shropshire.gov.uk/online-applications/files/B4626D0B5F34031073C538E2CF536559/pdf/21_00924_EIA-TREE_IMPACT_ASSESSMENT-4178072.pdf)

Because of the poor colour coding of individual trees values on landscape maps and the lack of a clear map showing which trees will be removed and which trees will be heavily pruned it is impossible to make an assessment in the parish of the impact of the proposal. Equally the uncertainties of damage by the off carriageway within the allocated development area cannot be assessed. The tree survey identifies 110 high and 126 moderate quality trees in the development area but the true figure is obscured by the separate addition of 4 high quality wooded areas and 4 wooded areas and 42 tree groups in the moderate category. The major impact will be on oak trees which comprise 74/110 high quality including 23/36 veterans, and 32/79 moderate quality trees. An unpublished assessment in Bicton parish suggests some 80% of mature trees are oaks. Although these numbers are high the tree removal data suggests 29 high quality trees, additionally 8 veteran trees, and part of 1 wooded area will be removed. The veteran tree loss is seen as representing a moderate significant loss (Biodiversity document). Within the moderate quality group 34 and 7 tree groups will be removed with 11 partial removals of tree groups and 2 wooded areas. Wooded areas in our parish to be removed or part removed include W209, W 431 and W147 (on the western shore of the Severn). Only 1 area of ancient woodland and that 1.1/17.8 hectares of old coppice in Alkmund Park Wood will be lost in the road proposal. Other trees within the development area are diverse – veterans include sycamore, beech, ash, maple, holly and willow but in high and moderate quality categories, hornbeam, plane, turkey oak and walnut are included. Given the siting of the road these losses of mature oaks probably cannot be further reduced. Details of plantings seem to largely consist of shrubs as along the A5. Nationally we are now aware that many such plantings are not with native species but with imported related species that look similar but may not be able to host invertebrate species that are often specific to particular tree species. Shrubs are no substitutes for mature oaks which have the most diverse invertebrate fauna of all trees. Future substantial oak tree loss in Bicton is likely because most trees are 200 years old and there are few saplings.

- ii. **Hedges** (CHAPTER 8 - APPENDIX 8.3 Hedgerow survey https://pa.shropshire.gov.uk/online-applications/files/51274D8FEE1439965047067F27C71939/pdf/21_00924_EIA-HEDGEROW_SURVEY_REPORT-4171976.pdf)

Hedgerow damage and disruption by the scheme is inevitable. Hedgerows can be nationally (but arbitrarily) classified as important if they contain more than 4 wooded species e.g. blackthorn, hawthorn, holly and hazel, and unimportant if they contain fewer species. Of the 48 hedgerows assessed for this scheme 11 were assessed as important by this measure of biodiversity. Approximately 4km of hedgerow will be lost (Biodiversity document).

- iii. **Other flora** (ES CHAPTER 8 - APPENDIX 8.2 Botanical survey https://pa.shropshire.gov.uk/online-applications/files/108B1E95D40A3B481BA93887EDA32062/pdf/21_00924_EIA-BOTANICAL_SURVEY_REPORT-4171978.pdf)

This study selects sites, applies the national vegetation scheme to classify their ecology and lists quadrat analysis and species occurring outside the quadrat. It pays particular attention to Hencote Pool a site of international importance as a Ramsar site. This particular application has moved the road further away from this site. In Bicton parish it pays detailed attention to Shelton Rough down to the Severn. Within the quadrat study in the parish there are no notable findings. Annexe A, however contains a species list for the whole NWRR derived from Shropshire unsurpassed flora surveillance scheme and this can be compared with the Lockton and Whild Flora of Shropshire to discover relative rarities in Shropshire. Amongst these are species uncommon in Shropshire or nationally including: Anacamptis morio (the green-winged orchid), Bidens tripartite (trifid bur-marigold), Calamagrostis canescens (Purple small reed), Carex disticha (Brown sedge), Carex elongata (elongate sedge), Carex rostrata (Bottle sedge), Carex vesicaria (Bladder sedge), Circuta virosa (Cowbane), Comarum palustre (marsh cinquefoil), Epipacts helleborine (Broad-leaved helleborine) to mention approximately 30% of less common species. As the quadrat survey was conducted in August some of these species may have been overlooked and a more systematic search of localities is probably justified to avoid damage in road construction

- iv. **Birds**

A number of transects counting birds seen in winter have been conducted. No conclusions are drawn in the surveys on damage that might be done by construction of the NWRR and in the Biodiversity section there are no suggested mitigation measures after construction. The RSPB report that there has been a gradual but steady and significant decline in a wide variety of species. They have seen greater reductions in farmland species as opposed to woodland species but there are some woodland species also now in decline. Studies show that the loss is largely due to changes in agricultural practice and habitat change. This proposal will inevitably remove more habitats and could even impact on waterside birds given the proximity to the river. A further decline in bird populations seems highly likely as a result of this scheme and is highly undesirable given the losses already experienced.

- v. **Bats** (Chapter 8 Appendix 8.10 DEFRA Bat report https://pa.shropshire.gov.uk/online-applications/files/56382D272199458D22BDBBADF224907F/pdf/21_00924_EIA-DEFRA_BAT_REPORT-4171988.pdf)

Using bat recorders, a high level of bat activity has been detected involving commonly Pipistrelle species but also other bats including Horseshoe bats and Noctules on the linear hedgerows and lanes intersected by the proposed NWRR including particularly Calcott Lane, Shepherds Lane, and Clayton Way. The DEFRA report notes that most bats cross the application boundary at unsafe low levels and predicts an increase in bat mortality if the application is successful. No mitigation merely surveillance during and after construction is recommended in this document but some mitigation is suggested in the Biodiversity document. Building and tree surveys (Chapter 8 Appendices 8.12. and 8.13 https://pa.shropshire.gov.uk/online-applications/files/869B7B08126FDFDCFBFE243728C3E475B/pdf/21_00924_EIA-BAT_BUILDINGS_SURVEY_REPORT-4171991.pdf <https://pa.shropshire.gov.uk/online->

[applications/files/FACB47F08BF669F798FB12B075864742/pdf/21_00924_EIA-BAT_TREE_SURVEY_REPORT-4172004.pdf](https://pa.shropshire.gov.uk/online-applications/files/FACB47F08BF669F798FB12B075864742/pdf/21_00924_EIA-BAT_TREE_SURVEY_REPORT-4172004.pdf)) within the application boundary yielded evidence of a summer bat roost at West View which is to be demolished and a number of trees highly suitable as roosts were detected.

- vi. **Great crested newts (Chapter 8 Appendix 8.4. .Great Crested Newt Survey Report**
https://pa.shropshire.gov.uk/online-applications/files/8C0CE95F408E43236B3C8EF6347C94C9/pdf/21_00924_EIA-GREAT_CRESTED_NEWT_SURVEY_REPORT-4171998.pdf)

Survey work confirms great crested newt populations in ponds WB09, WB12, WB29 and WB55 between Holyhead road, Welshpool Road and the A5. WB09 is the pond on Calcott Lane, WB12 is a pond on Shepherds Lane on the other side of the road from Oxon Pool between it and the Welshpool Road, WB29 is on Clayton Way at the junction with Welshpool Road. WB55 is a source of the Bicton Brook between the truncated lane to Preston Montford and the Holyhead Road. New mitigation possibilities include a district license which has no requirement for newt precaution but merely a financial payment to compensate for damage to newt populations.

- vii. **Fish (Chapter 8 - Appendix 8.6 Fish Survey Report** https://pa.shropshire.gov.uk/online-applications/files/7B968F4EAF1625595716445C1634B553/pdf/21_00924_EIA-FISH_SURVEY_REPORT-4172000.pdf)

The pool in Calcott Lane was not assessed as it was deemed to be flooded woodland. The River Severn was assessed only from historical fish surveys and mitigation measures included. Other ponds most notably Oxon Pool which is a fishery managed by Shrewsbury Town Council and which the application boundary passes very close to and where works to the water supply are envisaged were not assessed but should have been.

- viii. **Other amphibians & reptiles**

No separate amphibian survey was commissioned but in a number of documents including that on kerb design, it is noted that there will be an increase in mortality due to amphibians being trapped on the road. This is deemed of negligible effect but is surely highly undesirable at any level? No reptiles were detected during a specific survey (Chapter 8 - Appendix 8.17 Reptile Survey Report https://pa.shropshire.gov.uk/online-applications/files/5819CD461ECD2E22C1C4C0D08763899B/pdf/21_00924_EIA-REPTILE_SURVEY_REPORT-4172052.pdf) or as an incidental finding during other surveys in the parish.

- ix. **Dormice (Chapter 8 - Appendix 8.15 Dormouse Survey Report**
https://pa.shropshire.gov.uk/online-applications/files/338D15F3A8F220126BA3047B88822700/pdf/21_00924_EIA-DORMOUSE_SURVEY_REPORT-4172060.pdf)

On the results of a nesting tube survey, dormice are judged to be absent from the application boundary with their nearest recorded location in Pontesbury. Nevertheless, habitat was deemed suitable for dormice in wooded locations within the application boundary.

- x. **Mammals Chapter 8 - Appendix 8.16 Riparian Mammal Survey Report**
https://pa.shropshire.gov.uk/online-applications/files/6D11B4D63179D822870936A5F855E60D/pdf/21_00924_EIA-RIPARIAN_MAMMAL_SURVEY_REPORT-4172059.pdf)

Surveys focussed on otter and water voles. There are dead otter records for Welshpool Road and Holyhead Road and otters are widespread on the Severn. However, no definite evidence of current otter population was found on the Rover Severn near the crossing point of the proposed NWRR. Nevertheless, further survey work will be carried out prior to construction (Biodiversity document). Although the habitat was suitable for water voles, no evidence of their presence was

found. No surveys of badger setts within the development boundary are detailed but the document on Biodiversity reveals 9 badger setts, two of which are major within the application boundary. Two, one major, will be lost. Badger tunnels under the road and a new set will be constructed as mitigation. There is no discussion of deer or other mammals. Extensive badger-proof fencing to divert badgers under the road at crossing points distant from their current crossing points are evident in landscape plans.

- xi. Invertebrates (aquatic) (Chapter 8 - Appendix 8.5 Aquatic Macroinvertebrate Survey Report https://pa.shropshire.gov.uk/online-applications/files/92C566919C0486D09AAE92639B8AE18B/pdf/21_00924_EIA-AQUATIC_MACROINVERTEBRATE_SURVEY_REPORT-4172002.pdf)**

The yellow mayfly is a red-listed endangered international Union for Conservation of Nature species, a UK Biodiversity Action Plan priority species, and is covered by the NERC Act 2006. It was the commonest invertebrate found in water sampling within the application boundary on the River Severn. Additional species of note were the small minnow mayfly, and humplless casemaker caddis-fly but these were only single individuals compared with 133 yellow mayfly. This site was of high ecological importance. Standard mitigation measures during construction are recommended

- xii. Invertebrates (terrestrial) (Chapter 8 - Appendices 8.18 and 8.24 Terrestrial Invertebrate Surveys https://pa.shropshire.gov.uk/online-applications/files/6CF06AB40CA111CEF80725DCAC26C973/pdf/21_00924_EIA-TERRESTRIAL_INVERTEBRATE_SURVEY_REPORT-4172050.pdf https://pa.shropshire.gov.uk/online-applications/files/B5AD2650702AC11B70CA51C4B0A9FA2E/pdf/21_00924_EIA-TERRESTRIAL_INVERTEBRATE_SURVEY_REPORT-4172046.pdf)**

This study excluded moth trapping which is unfortunate given the previous reference to the very high moth diversity detected at the Preston Montford Field Study centre within 2 kilometres of the application boundary at the Churncote roundabout. A desk survey of invertebrates noted records within 2km of the application boundary of 39 species of conservation concern. 24 species of butterflies and moths feature in these species, 22 of which are priority species. Multiple visits were undertaken during 2019 concentrating on Shelton Rough and areas east of the River Severn outside the parish. 12 species of conservation concern were noted including the white hairstreak butterfly. A number of species of scarce and local distribution were also found

f) Other environmental matters

- i. Farm fragmentation.**

There is no section detected on farm fragmentation as such or the measures adopted to minimise this interference with normal agricultural activities.

- ii. Planting schemes**

There is no assurance on the nature of planting schemes to compensate for hedgerow and tree loss not in cuttings and this is essential to reassure the public that true native species are being used and as far as possible represent existing species in the landscape that will be removed. Lookalike imported species should not be used as they may not provide adequate habitat for native invertebrates.

- iii. Historical environment and archaeological surveys Chapter 11 Historical Environment https://pa.shropshire.gov.uk/online-applications/files/60EB3187773532D86A4A674AA5785647/pdf/21_00924_EIA-HISTORIC_ENVIRONMENT-4172133.pdf) and Chapter 11 Archaeological Evaluation Report Appendix 11.3 <https://pa.shropshire.gov.uk/online->**

[applications/files/D9D39AE9E9E47E89ED8FE00E45D8D571/pdf/21_00924_EIA-ARCHAEOLOGICAL_EVALUATION_REPORT-4172121.pdf](https://pa.shropshire.gov.uk/online-applications/files/D9D39AE9E9E47E89ED8FE00E45D8D571/pdf/21_00924_EIA-ARCHAEOLOGICAL_EVALUATION_REPORT-4172121.pdf))

Within the parish there is no evident problem with these although unexpected findings cannot be entirely excluded

- iv. **Greenhouse gas emissions (Chapter 9 Climate Change https://pa.shropshire.gov.uk/online-applications/files/5EABB3314E8A04A6C2BC0CE868AD4E75/pdf/21_00924_EIA-CLIMATE_CHANGE-4172074.pdf)**

The estimated CO2 emissions in the course of construction are 69.192 tonnes. This compares with a Shropshire annual total for road transport of 688200 tonnes so this is a significant deleterious effect. Approximately 70% of the emissions are associated with production of the materials so the effect of these may be distributed over a much wider area. Continuing emissions after construction as modelled are slightly different from pre-construction baseline but the statistical uncertainty surrounding this prophecy must be large and we do not consider this materially differs from the baseline.

11. Conclusion

The submitted documentation represents results of 20 years discussion and survey of this route and iterative changes. In this time, much has changed in Bicton and the local area. The development is in close proximity to the northern boundary of Shrewsbury and the environmental effect within Bicton must be classified as large. The road's proximity to Shrewsbury may not be in the best interests of residents in Bicton parish or the northern outskirts of Shrewsbury or their access to adjacent rural areas. The historical foundation of the planning application does not consider current concerns about the environment or possible permanent changes in society or working practise arising from homeworking in the Covid-19 pandemic. National mitigation measures for climate change such as the transition to electric vehicles are not considered when subjects such as air and noise pollution are considered as advantages of the scheme. These concerns have changed very considerably since the Outline Business Case was submitted and this planning application was initiated and indeed the economic and debt scenario in government is very different now. Ecologically the results of a successful application will be negative and on a grander scale than anything put forward in Shropshire in the last 20 years. On the basis of the application, it is not possible to assess on a Shropshire or Shrewsbury basis whether the economic benefit and risk of a completed north west relief road is either substantial or of a scale to outweigh the negative ecological effects. Construction work and the completed proposal would both bring negative effects for the population of Bicton parish.

In an extraordinary meeting of BPC on 06/04/21 there was some recognition that there would be some business access benefits from implementing this scheme but in terms of Bicton Parish there was a clear majority view that the negative impacts through the development period and then the enduring impact throughout the life of the road are such that BPC object to the implementation of this scheme as outlined.