

## FURTHER SUBMISSIONS TO THE PLANNING INSPECTOR

### Outline/strategy

1. Make it clear I represent WARD (Wharfedale & Airedale Review Development)
2. .... that the issues apply all along the Wharfe Valley
3. .... that BMDC are evasive, unhelpful and don't provide reliable information
4. ... that the small communities are all linked by one road and have common problems, which relate to their common geology, geography, topology and predisposition to groundwater emergence.

### MATTER 2: REVISED SETTLEMENT HIERARCHY

- a. We say there is no sound evidential basis for 'promoting' Menston or Burley to Local Growth Centres - and this issue is NOT pivotal on the HRA. It is broader and more fundamental than that! Such evidence as BMDC relies upon has been provided by the developers, their agents and related infrastructure contractors and is completely biased towards enabling the construction of more housing in locations with the greatest potential for profit.
- b. Menston and Burley are residential villages, with extremely limited facilities and infrastructure - sufficient to support the current population but not capable of expansion without such reconstruction as would destroy their semi-rural character. What is the 'function' of these villages if not to remain attractive, small villages? They do not and cannot offer opportunities for significant employment. They do not and cannot contribute in any material way to the regeneration of Bradford, other than through the elevated levels of Council Tax levied on their residents.
- c. There is some limited scope for infill housing, but there are few shops, schools (no secondary school in either location), no bank, and the libraries are now operated on a voluntary basis as are most other former Council functions. There is limited space for parking, resulting in huge problems with on-street parking, and no opportunity to absorb a substantial increase in population. There is one main road and one railway line which is itself a rail 'cul de sac' to Ilkley. Neither the A65 nor the rail line are capable of carrying much more traffic at peak times (for travel to work or to schools), and the A65 carries the majority of the visitor traffic to and from the Yorkshire Dales (particularly at weekends) which does not make either of these villages accessible in the way they are described, especially given existing levels of congestion.

### MATTER 3: REVISED SPATIAL DISTRIBUTION OF DEVELOPMENT

#### c. Wharfedale

- i. We believe this is for BMDC to answer, as they keep ‘moving the goalposts’ in response to lobbying by developers, and the apparent willingness of Planning Officers to accept all the ‘evidence’ from the developer lobby and to deny the opponents information or a genuine hearing. We can see no justification for the recent increases: in fact we can see no justification for BMDC’s stated figures for job creation, population growth or housing need, as these have been contradicted by more independent evaluation.
- ii. In a word - NO! The Wharfe Valley is rural, pasture and woodland, as correctly described in BMDC’s own Landscape Character Supplementary Planning Document, Volume 8: Wharfedale  
[link: [http://www.bradford.gov.uk/NR/ronlyres/5C92AD9D-AF22-4963-B923-D05B1C53B333/0/Vol8\\_Wharfedale\\_October2008.pdf](http://www.bradford.gov.uk/NR/ronlyres/5C92AD9D-AF22-4963-B923-D05B1C53B333/0/Vol8_Wharfedale_October2008.pdf) ]

We can see no legitimate reason for moving away from this characterisation.

If BMDC’s housing numbers had been calculated using a robust methodology there would be no need to look for development on Green Belt, although that is clearly what the developers want for reasons of margin and profitability. The pasture land above and bordering the River Wharfe slows the progress of, and absorbs, run-off and groundwater from the surrounding moors as it proceeds inexorably to the river. To build on that land not only breaches NPPF policy in respect of Green Belt but would exacerbate the existing, well-evidenced and obvious flood risk. Where this has happened, in Cumbria, Somerset and quite recently in Calderdale, the consequences in respect of local and downstream flooding have been catastrophic and costly. That would not be of consequence to the developers, of course, but it would to any unfortunate house-owner. Once again, BMDC has failed to undertake a systematic evaluation of flood risk, and categorises these areas in Flood Zone 1 because the Environment Agency has not yet got around to classifying flood risk from groundwater. BMDC knows where the floods occur, and they also know that building on the areas which serve to PREVENT flooding will have disastrous consequences.

As for the much-vaunted “excellent road and rail links” between Menston, Burley and the cities of Leeds and Bradford, no serious study has been made of the implications for these small settlements.

In relation to the roads, BMDC’s own District-Wide Transport Study of October 2010 (undertaken, competently, by Steer Davies Gleave) assesses the A65 as congested but incapable of significant improvement. According to that study, every new dwelling in Bradford District would generate 8.48 car journeys (trips) per day, and in Wharfedale Ward, that means predominantly using the A65 and ‘rat-runs’ (euphemistically described as “re-assignment of traffic onto parallel local routes”) which that study characterises as an increasing source of danger (see extract below).

### **Corridor 7: A65/A6038 (Wharfedale corridor between Addingham and Shipley)**

#### *Evidence*

- 7.93 The Preferred Option has around 3600 new dwellings planned in the Wharfedale corridor, which is concentrated in Addingham, Ilkley, Burley and Menston. Additionally there are 5,000 new dwellings planned for the northeast of Bradford.
- 7.94 As shown in Appendix B: Figure B7.2, demand flows in the Preferred Option are significantly higher than in the base year along the length of the A65 and A6038 from Addingham to Shipley. The situation is complicated by re-assignment of traffic onto parallel local routes to avoid delays on the A65/A6038. The additional demand is highest between Burley and Shipley, with around 1000 - 1400 extra vehicles in both directions split between the A65/A6038 and parallel routes.
- 7.95 Appendix B: Figures B7.3 and B7.4 show respectively delays in the Preferred Option and the increase in delays over the base year. Significant increases in delay are apparent at junctions in Ilkley, Menston and Guiseley. Even though Guiseley is in Leeds district, delays at the junction of the A65 and A6038 will have serious effects on connectivity both within Bradford district, and between Bradford and Leeds.
- 7.97 There are currently no significant transport schemes currently planned for the A65/A6038 corridor, above those shared with the Airedale corridor (such as improved interchange at Shipley) that have already been discussed.

Many residents of Otley and Newall, which do not have a railway station, tend to travel by car to Menston to use the rail facilities, creating parking problems which the village hasn't got the space or scope to address. There is no source of significant employment in either Burley or Menston so all traffic to work, which is predominantly in Leeds and relatively little in Bradford, must use the Wharfedale Line through Burley and Menston and/or the A65 (or drive the A65 through Burley to Otley and then use the equally congested A660 into Leeds). In that situation, it is farcical to consider it a solution to "*... recommend a focus on making best use of the existing rail services on the Wharfedale line, and specifically, encouraging modal shift to rail from car by improving the provision of Park and Ride at all outlying rail stations.*" Menston station's car park and all adjacent streets are full of commuters' cars by 8.30am every working day. Expansion is simply not feasible. The consultants who produced this Transport Report for Bradford suggest that "demand management" may be the only solution, ie. to increase the cost of motoring and parking to force cars off the roads and those wishing to travel onto public transport or bicycles (paras. 7.161 to 7.166). How can that be viable for Burley and Menston?

A report was produced by Leeds City Council in 2005, which even then described the A65 in the following terms:

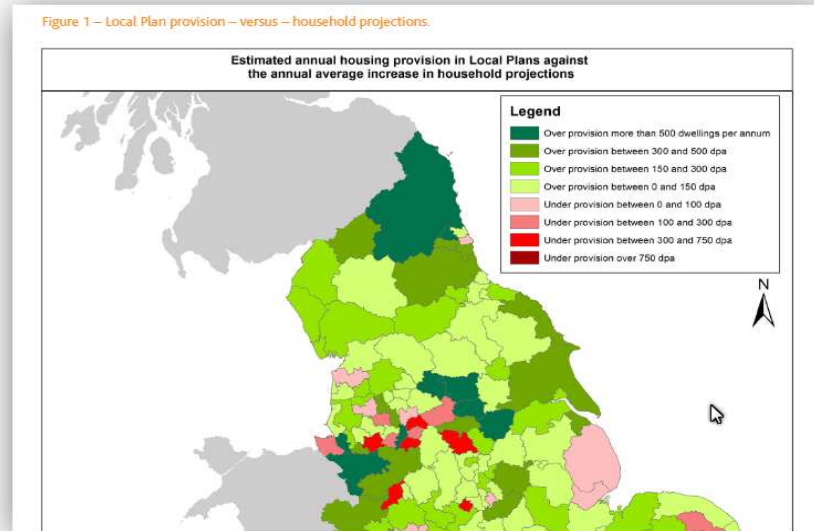
- The A65 is operating at capacity at peak times and suffers severe congestion on a regular basis;
- The A65 is the only major radial route to the cordon which is not dual carriageway, yet it carries (with delays) the volume of traffic equivalent to a dual carriageway;
- The A65, between Rawdon Traffic Signals and the A65/A6038 ("The Fox") roundabout at Menston, is also operating at capacity during the weekend periods;
- Peak spreading is exacerbating the congestion problem by extending the duration over which congestion and delays are encountered;
- The A65/Outer Ring Road at Horsforth and Outer Ring Road/A657 at Rodley are key junctions with significant delays during AM and PM peak periods.

WARD commissioned an independent transport consultancy group in 2011 to undertake a full traffic survey and study of the A65. The Consultants, Met Engineers Ltd., concluded:

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| 4.12 | The A65 was definitively stated not to have the capacity to carry all the additional trips in the peak period which were identified in 2005. Since then, the reduction in centres of employment in the Wharfe Valley has accelerated, residential development has taken most of the former employment sites and created a new generation of commuters to Leeds and Bradford, and the airport has demonstrated substantial expansion in both passenger and freight traffic, which is forecast to continue such that passenger numbers by 2030 will be three times their volume in 2004/5. |
| 4.13 | There is little or no scope for infrastructure improvement in the entire length of the A65 under consideration as it lies in a valley with constraints on development on either side and 'ribbon development' in the intermediate settlements.   |
| 4.15 | The A65 is simply unfit for the volume of traffic now using it, whether on weekdays or at weekends, and any further increase in capacity will see further reductions in traffic flow speeds, higher levels of congestion and a continuation of the practice of trying to make more rapid progress by "rat running" onto even less suitable roads through residential areas."   |

At the Hearings held by the Inspector in 2015 (as reported to me, as I was not present), Bradford Council was asked about its own in-depth study of the A65 and admitted that it hadn't done one. I was told that the Inspector regarded this as some essential and urgent "homework" for BMDC. Has the Council undertaken such a study? If not, why not, when it's a key element of the requisite evidence? If so, where is it, and why has it been withheld from the public?

- iii. BMDC has massively inflated its Housing Need figures, as confirmed by the DCLG Expert Group in its report to Government, released only last month. Bradford is one of the LPA's which has "overprovided" more than 500 dwellings per annum above the realistic increase in housing projections (see map/diagram below).



Furthermore, BMDC initially estimated its employment growth to be 4,424 new jobs per annum, which (it said) would drive its housing need. This was subsequently revised (down) to 2,897, and the latest revision moves the figure down again to 1,572 annually (using the Regional Econometric Model). That being the case, there can be no justification for BMDC failing to make a corresponding reduction in the requirement for new dwellings. If that adjustment was made, it seems likely that no more than 24,000 new dwellings would be required over the Plan Period; there is sufficient brownfield (near to employment) to meet this requirement without touching ANY Green Belt.

Bradford's record of construction in recent years is lamentable. Their planning methodology is shambolic, uninformed and compromised by the close relationship between their Planning Officers and developers and their agents. Further, there is a predisposition in Bradford Council to penalise those communities which display a consistent tendency to favour political parties other than Bradford's "ruling group". BMDC's Councillor Val Slater, the Executive Member for Housing and Planning, was quoted at a regular forum where Council Members and agents for developers meet as saying: *"I'm not yet seen as the devil's disciple in the eyes of objectors to housing plans but fully expect to become so. .. At Holme Wood we stood up to middle class objectors in order to release land for this scheme. ... Sometimes we'll give in to pressure in the knowledge that the appeals process is there. We are willing to listen but it's important that we all work together, including with developers, in a way that will take Bradford forward."*

(Source: Telegraph & Argus, 26 January 2012).

The question of "balance" between greenfield and brownfield land is crucial when we consider flood risk. The city of Bradford is relatively hilly and its centre is an average of 60 metres above sea level. There is a

canal running through parts of the city (an engineered and controlled watercourse) but there is no river beyond Shipley and minimal risk of flooding. That is not the case for Menston or Burley, which sit on the south bank of the Wharfe. There is an enormous, unmissable amount of evidence relating to flooding (typically groundwater and pluvial in the first instance, later joined by fluvial overflow) along the Wharfe Valley from Addingham through Ilkley to Burley and on to Otley. This closes the A65 on frequent occasions, particularly at a location (Manor Bends) where CEG Land Promotions Ltd., are lobbying to build in excess of 500 units, which would be a big step towards closing the Green Belt gap between Burley and Ben Rhydding.

In Menston, the village being more distant from the river, we suffer groundwater emergence and pluvial flooding, the latter compounded by the fact that Menston has combined sewers, so any surcharge of ground/pluvial water causes human excrement to surge onto our streets. Neither Bradford Highways nor Yorkshire Water nor the Environment Agency can decide whose responsibility this is, yet Bradford Council continues to give approval to construction proposals on the higher land, which would simply accelerate the progress of water flows into the Victorian sewer and drainage system. There is ample evidence (in the Review of Water Management and Flooding in the Bradford District commissioned by Bradford Council in 2003 and more recently, particularly from Dr Reed and Professor Rhodes) yet this evidence is entirely absent from Bradford's Flood Risk Management Strategy published in 2016.

Menston and Burley have noted with extreme concern that BMDC has permitted a development at Crack Lane in the village of Wilsden, just the other side (west) of Baildon Moor and with a similar moorland backdrop, topography and geology, and the residents (despite their objections and threat of legal action) find their houses overwhelmed by sewage and overflow from a watercourse - illegally diverted - and this development was approved on the same day and by the same Planning Panel as authorised developments on the moorland above Menston. BMDC are taking no responsibility for this, hiding behind supposed "conditions" for the development (which nobody can appear to validate) when the development should never have been approved if a proper Flood Risk Assessment had been undertaken. Assurances given by BMDC about proposed development on Green Belt are meaningless unless comprehensive, detailed investigation has been undertaken beforehand (preferably by an independent body) to inform the R&A Committee (Planning Panel) in a way that the Planning Officers of BMDC simply neglect.

Alan D Elsegood  
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