

Further Statement from Menston Action Group
Bradford Core Strategy Main Modification Examination

April 2016

Matter 1: South Pennine Moors and Policy SC8

If it is not made clear already in the Core Strategy, it should be clarified that the mitigation measures attached to Zone C also apply additionally to any sites in Zone B. This is because the area within Zone B (up to 2.5km) is also in Zone C (up to 7km).

Matter 2: Revised Settlement Hierachy - Policy SC4 and associated policies

Proposed changes to the HRA do not make it sound to upgrade Menston and Burley to Local Growth Centres. There are other reasons why it would be inappropriate to upgrade Menston to a Local Growth Centre.

These include:

- **Green Belt constraints**
- **Local ground water flooding**
- **Overcapacity of the major trunk roads in particular the A65 into Leeds**
- **Oversubscribed secondary schools**
- **Little opportunity or demand for local employment.**
- **Cross-boundary issues**

It is unsound to presume without further detailed analysis that there are enough suitable sites to deliver the number of houses proposed; as such Menston should not be re-designated as a Local Growth Centre and cannot accommodate an increased housing allocation because it cannot be shown to have the capacity of suitable or sustainable sites to deliver the proposed number of homes, not even 400 let alone 600.

Green belt constraints

Planning Practice Guidance issued by the Government in March 2014 aimed to make clear that “unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt”. This was followed up with further changes to planning guidance issued in October 2014.

Bradford Council has previously illustrated in the Core Strategy Publication Draft how it would deliver the City’s housing targets without changes to the greenbelt in and around Menston, as such further changes to the green belt in Menston **does not constitute exceptional circumstances** to release additional land from the Greenbelt to meet targets (ref NPPF and Planning Guidance).

Local groundwater flooding

Menston has a proven susceptibility to groundwater flooding (reference - Reed, DW. Independent review of Menston flooding problems. December 2014).

- An independent Review of Menston Flooding Problems highlights that there are specific problems of groundwater flooding which are unique to Menston.¹
- An important factor is the prevalence of springs and responsive groundwater from the Millstone Grit aquifer underlying the hillside on which Menston sits.^{1,4}
- The hillside on which Menston sits is drained by a number of small streams. Some of these are seasonal, with flows only occurring in wet weather and/or when groundwater levels are unusually high.¹
- Prolonged rainfall events cause significant flooding in the local area.²
- These problems are heightened by the unique setting of Menston. The most unusual feature is the transverse drainage of Matthew Dike. Upper sections of Matthew Dike overflow into the Derry Hill catchment in major flood events such as that of 24 September 2012 and 26th December 2015.^{1,2,3}
- Furthermore, groundwater levels were previously suppressed by the extraction of groundwater at the former High Royds Hospital Pump House. The abstraction ceased on closure of the hospital in 2003. Extension of Menston village southwards has mainly taken place in an era where spring flows were being suppressed by this major abstraction. The spring flows are no longer suppressed and groundwater levels are now typically higher, and lands on the hillslope are now typically wetter than previously.¹
- The conclusions of a Geo-environmental appraisal for a previously allocated site says it is located within an area in which ground water flooding may be a significant issue. It goes on to say that installation of below ground rainwater / greywater storage, to conform to sustainability codes, is unlikely to be practical owing to the potential positive buoyancy of such tanks within the shallow groundwater regime, and that this may exacerbate the requirement for increased site discharges into existing drainage systems.^{4,5}
- The Environment Agency flood zone maps only apply to Coastal and River flooding, not groundwater flooding.⁶
- A full planning application has been rejected; one of the reasons being that the applicant had failed to demonstrate that the submitted drainage scheme will be adequate to prevent the increased likelihood of flooding of properties off the site. The development would therefore be contrary to Policies UR3 and NR16 of the adopted Replacement Unitary Development Plan and Paragraph 103 of the National Planning Policy Framework.⁷
- The applicant initially submitted an Appeal to the Planning Inspectorate but has subsequently withdrawn. This is the second time they have withdrawn an appeal for this site.
- Another site at Derry Hill is now a matter for the Court of Appeal later this year.

To this day, both of the former RUDP allocated sites have been undeliverable because of ongoing concerns about groundwater flooding.

All the sites surrounding Menston identified in the SHLAA are susceptible to groundwater flooding. This has been demonstrated by regular floods, most recently on 26th and 27th December 2015. This is backed up by photographic evidence and reports from experts in hydrology.

We do not believe that the large-scale expansion of Menston is either deliverable or achievable or sustainable for exactly the same reasons. It is therefore unsound to promote Menston to a Local Growth Centre.

Overcapacity of the A65.

This road is already heavily congested into Leeds. Adding more and more developments along its route, both by Leeds and Bradford, will only serve to worsen the gridlock.

Oversubscribed secondary schools

Menston is not within the primary catchment for Ilkley Grammar School. Most applications from Menston children are rejected. St Mary's school is a restricted faith school. Most children have to attend Guiseley School which is in Leeds and becoming full with increasing number of developments across the border.

Little opportunity or demand for local employment.

There is very little employment in Menston. Most people have to commute mainly to Leeds and some to Bradford. Expansion of the village will put a greater strain on the A65 or Wharfedale train line. From Menston station, 78% of railway commuters are travelling to Leeds. The train frequency cannot be increased due to congestion at Leeds station. The number of carriages cannot be increased because of platform length and without substantial investment.

Cross-boundary issues

Menston is a village split across the borders of Leeds and Bradford. It has already seen c600 homes built on the former High Royds Hospital site and a further large site proposed at the nearby Ings Lane fields in Guiseley. The NPPF says that Local Planning Authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination.

Except for a consultation response from Leeds City Council, there seems to be little evidence of true collaboration including joint committees or a jointly prepared strategy, as advised in the NPPF.

Matter 3: Revised Spatial Distribution of Development – Policy SC5, WD1, HO3.

For all of the reasons explained in previous submissions and in the above statement for Matter 2, any substantially increased housing allocations for Menston may be undeliverable but particularly in relation to local groundwater flooding.

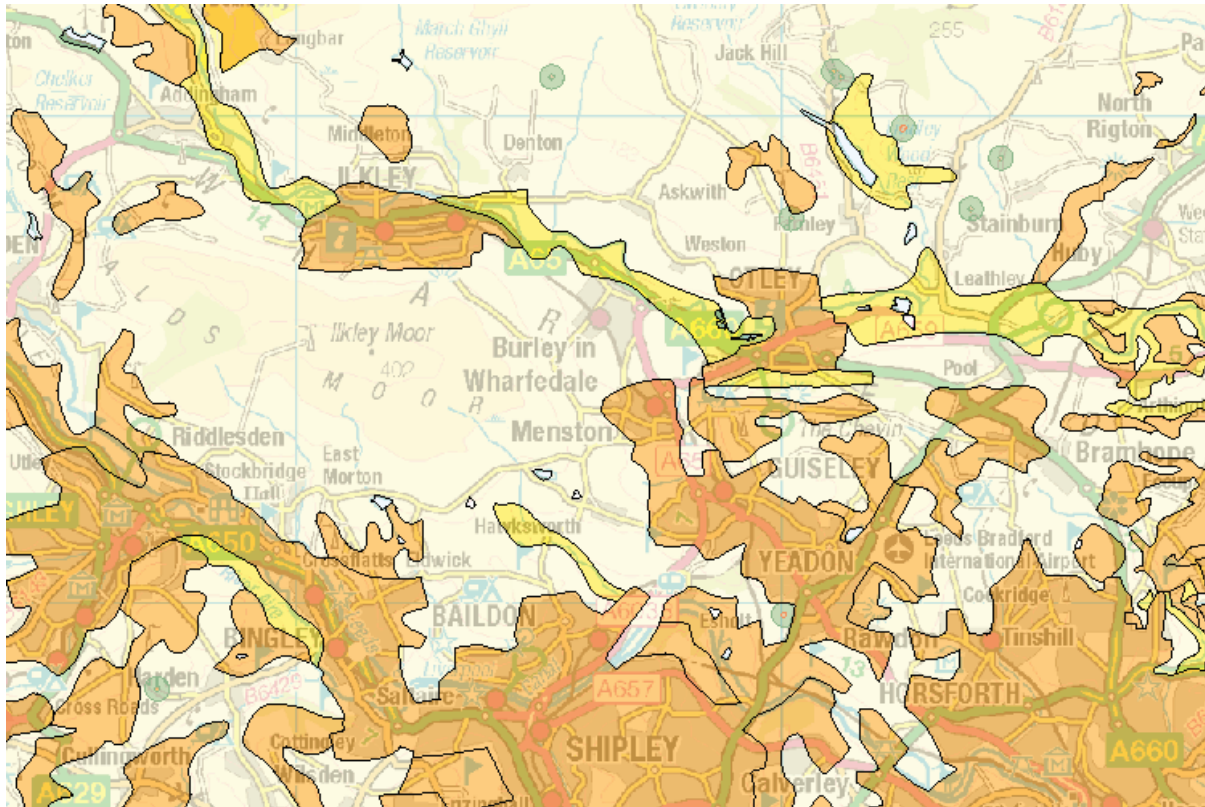
Matter 4: Other Policies

Requested changes to Policy EN7 have been proposed in a separate paper.

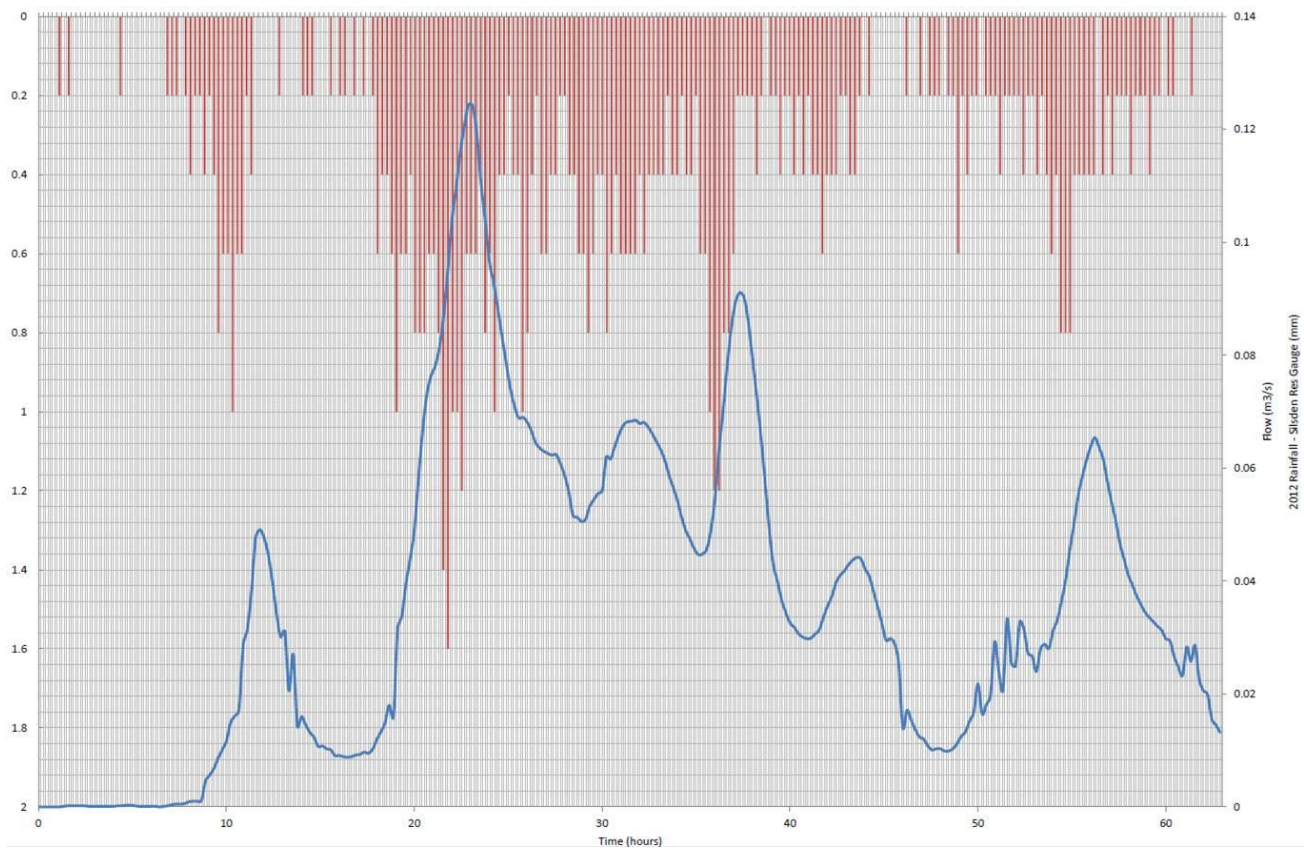
References

1. Reed, DW. Independent review of Menston flooding problems. December 2014
2. Professor J D Rhodes – Witness Statement Ref App/W4705/A/11/2167397 Appeal by Taylor Wimpey. 9th April 2013
3. Professor J D Rhodes. A Report on the Observed Rainfall Run-off on the Derry Hill and Bingley Road Sites during Prolonged Rainfall Events. April 2014
4. Sirius Geotechnical & Environmental Ltd. Report C3545.Geo-Environmental Appraisal for land at Bingley Road, Menston. Prepared for Taylor Wimpey (UK) Ltd December 2009.
5. Sirius monitoring results. Dated February 2010. Available January 2015.
6. Environment Agency. <http://apps.environment-agency.gov.uk/wiyby/37837.aspx>
7. City of Bradford Metropolitan District Council. Decisions of the Regulatory and Appeals Committee held on Thursday 29 January 2015.
8. Environment Agency. Rainfall runoff management for developments. Report SC030219. October 2013.
9. UK Government response to consultation on reforming the Water Abstraction Management System. 15th January 2015.
10. City of Bradford MDC. Local Flood Risk Management Strategy. 2016.
11. Pourkashanian, M, and Ingham DB. Flooding Report. 5th June 2015.
12. Rhodes JD, and Dixon, G. General Constraints on Water Run-off From a Rainfall Event.

Groundwater high vulnerability zones



Water flow from Derry Hill correlated to measured rainfall



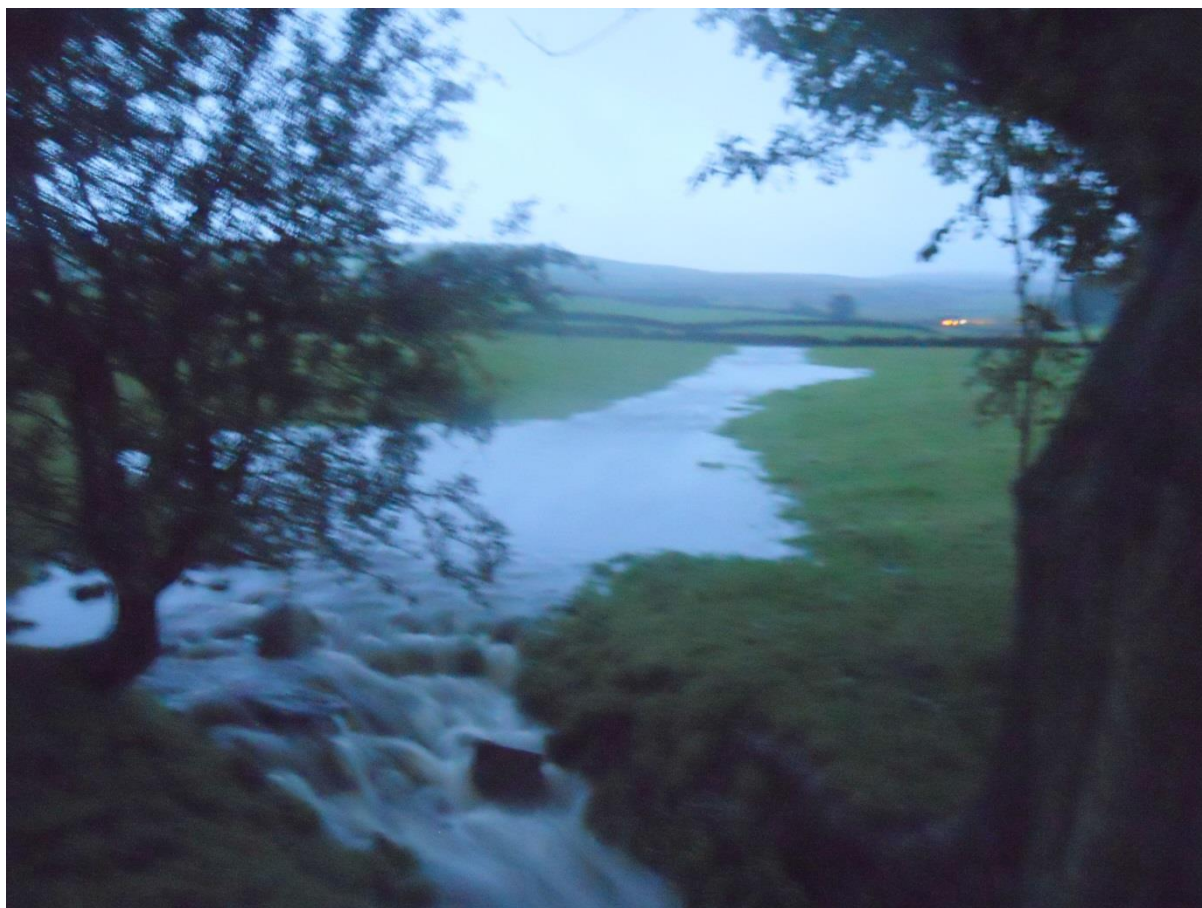
Derry Hill footpath and substation on a wet day



Derry Hill on a dry day



Groundwater emergence at Derry Hill





Groundwater flooding to west of Clarence Drive



Groundwater emergence at Bingley Road





Sewerage overflowing out of the combined sewer on Main Street



Flooding at Moorfield Avenue



Flooding at Dicks Garth



Serious flood risk

I REFER to the front pages of both the *Ilkley Gazette* and the *Wharfedale Observer*, dated March 31.

An up-to-date publication regarding flooding and drainage issues from Bradford MDC has just been published (Local Flood Risk Management Strategy).

I would like to point out, from Addingham to Menston, various groups, from parish councils to action groups, have been pointing out serious concerns about the lack of joined-up thinking when it comes to flood risk.

There are examples in the district of shortfalls in planning controls leading to developments being blighted. Where there are old Victorian combined sewers, in some circumstances these cannot cope now and most certainly will not be able to cope with proposed large-scale developments.

I quote from this latest document: “National flood management has previously been managed in a disjointed way. Flooding from rivers (fluvial) has passed between successive government agencies, whilst land drainage and sewer flooding has been managed in a variety of combinations on local authorities and public and private water companies. The blurring of boundaries for responsibilities and unco-ordinated actions of different risk management authorities has resulted in a failure to provide consistent and co-ordinated actions in response to local flooding events.”

I have, with many others, been in dialogue with all of the agencies who are likely to have some input regarding flooding and drainage. The buck passing is quite extraordinary. Is it not time for someone to get a grip, particularly on the health risks regarding sewer flooding which is now becoming a regular event?

It is a well-known fact the pollution in our streams occurs on a regular basis and that the odd failure at a treatment plant is no longer the reason. According to an OFWAT report on new housing developments, they voiced concerns about additional new housing without making provision for suitable drains and making sure existing sewerage systems could deal with the extra load. They also pointed out problems have become worse since new developments have been built and overloaded the sewerage system, and concluded that sewage flooding had been a problem for the past ten years and was probably due to extra building of houses in an area.

Just like any other problem in life, prevention is better than cure. This means that considerable re-plumbing of sewer systems to allow for large-scale developments must be a priority and thereby reduce the risk. The infrastructure must be able to withstand large-scale developments, which is certainly, in my opinion, not the case in Bradford district.

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Wharfedale and Airedale Review
Development (Ward)

Pipes can't cope with more homes

FURTHER to the article of March 31 – Anti-homes campaigners in judicial review battle (Gazette and Observer) – and associated comments made by Dr Steve Ellams in the letters pages of April 7 – Serious flood risk (Gazette and Observer) – the residents of Menston are all too familiar with failures of the current combined sewerage system during prolonged heavy rainfall, during which we regularly see raw sewage overflowing in the streets.

This is a result of huge volumes of groundwater from adjacent hills and fields overflowing from culverted watercourses, running both over ground and underground, entering the sewerage system and overwhelming the combined surface water and foul water pipes.

These events would only get worse if large-scale housing developments were ever allowed to proceed without upgrading the system, by discharging even more surface water and foul water into the pipes.

It must be obvious to all authorities that we cannot continue to expand a former hamlet to a village and then to a small town, connecting more and more effluent into existing pipes originally built for smaller settlements.

Furthermore, it is unacceptable for new developments to be approved without due regard for groundwater flood risk on the ba-

sis that the area is categorised by the Environment Agency as only being in Flood Risk Zone 1, which is often quoted by developers and planning officers as being the zone with lowest flood risk.

This is a delusive justification because the EA's flood risk zones only refer to river and coastal flooding, and do not take into account the risk of groundwater flooding.

On April 26, a novel solution will be presented by Professor JD Rhodes at a public meeting organised by the Menston Parish Council at Kirklands Community Centre in Main Street, Menston, at 7.30pm. Anyone with an interest in flood risk is encouraged to attend.

Philip Moore

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