

Verbal statement for Planning Inspector's examination

Philip Moore on behalf of Menston Action Group

Friday 20th May 2016

The Council have failed to incorporate groundwater flood risk into their sequential testing. This makes the Main Modifications **unsound** in relation to the revised Settlement Hierarchies and Revised Spatial Distributions.

In the Council's Further Statement about Matter 3 addressing Flood Risk (May 2016), it is clear that their sequential testing is **only** looking at river and coastal flooding.

Please may I re-iterate the point made on Wednesday by Professor Rhodes, and in our submitted further statement to Policy EN7, that the Environment Agency Flood Risk zones solely refer to flooding from **Rivers and Seas**. They do **not** refer to **surface water or groundwater flood risk**.

Under the Flood and Water Management Act 2010, Local Authorities have the **overall responsibility** for addressing groundwater flooding risk locally. They are responsible for undertaking local flood risk assessments including groundwater, for assessing where these risks are significant, for mapping the associated risk where relevant, and for developing local flood risk management plans, as required by the EU Floods Directive.

The fact is that the Council in preparing the Core Strategy have not done the Sequential Testing properly. This is deeply concerning. The implications on the emerging Core Strategy are as significant, if not more, as the HRA issue.

The physical location of Wharfedale adjacent to the South Pennine Moors is as important with respect to flooding and flood risk as it is to habitats.

If the sequential tests had included groundwater flooding, it would have had an impact just as great on the settlement hierarchies as did the HRA.

Looking at Menston in particular:

- An independent review of Menston Flooding Problems (by Dr Duncan Reed ([library reference PS/D028e](#))) highlights that there are specific problems of groundwater flooding which exist in Menston. An important factor is the prevalence of springs and responsive groundwater from the Millstone Grit aquifer underlying the hillside on which Menston sits.
- This evidence is supported by the BGS Infiltration map submitted by the Council and for the Menston area has been validated by the numerous photographs and video clips of flooding events. Several of these were included in Prof Rhodes' lecture available on YouTube as well as being in the reports referenced.
- Thus, the Council's statement that they do not have the data to conduct a correct evaluation is unfounded. Furthermore, their conclusion that groundwater flooding is not an issue in the Bradford district has been shown to be wrong.
- Groundwater levels in Menston were previously suppressed by the extraction of groundwater at the former High Royds Hospital Pump House. This abstraction stopped when the hospital closed in 2003. Extension of Menston village southwards has mainly taken place when spring flows were being suppressed by this major abstraction. The spring flows are no longer suppressed and groundwater levels are now higher, and lands on the hillslope are now much wetter than previously.
- Furthermore, another pump house and reservoir above Hillings Lane have been decommissioned. This together with the High Royds pumphouse each extracted up to 30 million gallons of water per year, ie up to 60 million gallons combined.

The BGS map shows the two reservoirs which are now closed.

You asked on Wednesday whether it might be possible to deliver 600 houses from the SHLAA sites, and that the Council had suggested that flood risk could be addressed on a site by site basis at the DPD allocations stage.

It is our opinion that without a full district-wide Strategic Flood Risk Assessment, taking into account all sources of flooding, not just from Rivers and Seas, then it is almost impossible to say that the individual housing allocations are sound.

There is no evidence to suggest that any of the sites in the SHLAA around Menston are deliverable. Indeed the reverse may be true since they lie downstream of the hillside where groundwater emergence occurs during prolonged rainfall events.

In the absence of a proper strategic flood risk assessment to include all sources of flooding, I would urge the Council **not** to presume that Menston and other areas of Wharfedale can safely deliver the higher number of houses proposed in the emerging Core Strategy. This also has huge implications for the revised settlement hierarchy.

This matter is of such strategic importance that it cannot be left to decisions on a site by site basis as the flooding problems cannot be solved in that manner as explained by Professor Prof Rhodes in his lecture. On this basis, Menston and possibly other areas affected by groundwater emergence should be downgraded to at least their original status.

Menston or Burley in Wharfedale have never been legally signed off or legally designated as Local Growth Centres. The absence of proper sequential testing to include all sources of flood risk make it unsound to upgrade these settlements to Local Growth Centres or to increase the housing allocations.

Thank you

Library references

https://www.bradford.gov.uk/bmdc/the_environment/planning_service/local_development_framework/core_strategy_dpd_examination

Documents submitted by other parties

- PS/C002 - Independent review of Menston flooding problem by Dr DW Reed 11/12/14 - submitted by representor 376 Menston Action Group (3899kb)

Documents submitted by other parties - further statements

- PS/D028a - Further Statement Matter 7D (EN7) from Menston Action Group 376 (1259kb)
- PS/D028b - Further Statement Matter 7D (EN7) Sirius Report C3545 Page 25 from Menston Action Group 376 (138kb)
- PS/D028c - Further Statement Matter 7D (EN7) Sirius Monitoring Results from Menston Action Group 376 (233kb)
- PS/D028d - Further Statement Matter 7D (EN7) RA Committee Decision Notice from Menston Action Group 376 (112kb)
- PS/D028e - Further Statement - Independent review of Menston flooding problem by Dr DW Reed 111214 from Menston Action Group 376 (3899kb)
- PS/D028f - Further Statement - JDR Proof of Evidence from Menston Action Group 376 (6102kb)
- PS/D028g - Further Statement - Rainfall runoff report April 2014 from Menston Action Group 376 (10762kb)
- PS/D028h - Further Statement Matter 7D (TR35) from Menston Action Group 376 (424kb)

Further Statements in response to Modifications Matters Issues and Questions

- PS/J028a Menston Action Group 075 Main Modifications (3164kb)
- PSJ028b Menston Action Group 075 EN7 (2518kb)