

# MENSTON PARISH COUNCIL

(Founded 2006)

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7 March 2018

Dear Sir/Madam

**Ref. 17/04591/MAF - Bingley Road Planning Application – proposed development by Bellway Homes**

As a Statutory Consultee, Menston Parish Council urges the Planning Department of the City of Bradford MDC to take account of the serious errors and misleading items in the following reports submitted by or on behalf of the proposed developer, which need to be independently evaluated and drawn to the attention both of Officers and the R&A Committee:

- 1 Interim Travel Plan, prepared by WSP and dated July 2017.
- 2 The “Review of FRA and proposed drainage system” advanced by Envireau Water on behalf of Bellway Homes and dated November 2017.

The Parish Council, after detailed consideration, takes the view that both these reports, prepared for and commissioned by the Applicant, contain significant misrepresentations of fact, are based on hypothesis and theory and are not founded on professional or realistic considerations of the available evidence. As such, these reports do not amount to reliable evidence upon which the Planning Officers or the R&A Committee should place confidence.

In respect of both these matters, please find detailed analysis and commentary which is submitted by Menston Parish Council and which is intended for inclusion in any future reference of this Application to committee.

In addition, we understand that determination of this Planning Application has been postponed and is now subject to an Environmental Impact Assessment. We note from a letter in response to a Menston resident’s FOI request, that “The application is subject to a number of considerations including drainage and flood risk” and the Planning Department is indicating that the determination date has been extended to 29 March 2018. In the circumstances, it is urgent and imperative that our representations are scrutinised by the Officers and made available to the R&A Committee at the time of consideration. We request confirmation that this will be the case.

This submission has been approved and by endorsed:

Councillor Dale Smith  
Councillor Jackie Whiteley  
Councillor Gerry Barker  
Philip Davies MP  
Menston Community Association

MENSTON PARISH COUNCIL  
CONSIDERATION OF THE EVIDENCE SUPPLIED  
(by or commissioned by Johnson Mowat, Agents for Bellway Homes)  
in relation to the proposed development by Bellway Homes on Bingley Road, Menston

## TRANSPORT ISSUES AND THE INTERIM TRAVEL PLAN

relating to the “Interim Travel Plan” advanced by WSP, and included in the submission to Bradford Council Planning as part of Application No. 17/04591/MAF (July 2017)

The Interim Travel Plan, produced for Bellway Homes by WSP is a prime example of a **desktop report, produced without any effort to validate the reality ‘on the ground’**. In particular, the Interim Travel Plan sets out (inter alia) *“to reduce the impact and frequency of car travel ... reduce the impact of the development on the local road network (and) ... improve the health and well-being of the residents... .”* The report notes that there will be 133 housing units with an average of 1.5 vehicle spaces which means 200 cars and (at an average potential occupancy of 4.5 residents), around 600 people.

It suggests *“there are a number of employment areas located within a 5km distance”* of the site, but significantly fails to indicate what sort of vacant employment capacity there is in any, or the aggregate, of these sites. [The MPC knows that it is limited.]

The WSP report fails to recognise that, with average property values in Menston including those which are proposed on this site (semi-detached and detached) being between £280k and £800k, and only 40 properties being described as “affordable”, the earnings of any two-adult household is going to have to be a minimum of £50,000 per annum. Such an income is not easily going to be supported by the types of employment available locally.

**There are NO significant employment opportunities in Menston** itself, which has a total of only 70 ‘businesses’, most of which are effectively self-employment (40 of these businesses are sole traders). Only 6 (six) Menston businesses employ 10 or more people, and some of those are highly specialised businesses/employers such as the primary school and the car dealership, which engage specifically-skilled staff. In aggregate, Menston’s employing organisations provide jobs for only 300 people and of these only 108 are currently Menston residents. It should be obvious to the author(s) of the Interim Travel Plan, if they had done any ‘groundwork’, that any residents of the proposed new development will have to do what almost everybody else in Menston does – COMMUTE TO WORK – in Leeds or (less commonly) in Bradford.

According to the Summary at 4.4, *“Employment areas, further education, health care facilities and recreational facilities are all accessible to the site via walking, cycling and frequent and sustainable modes of transport.”* This is spurious, and needs to be revealed as such. The following sections of this analysis examine these assertions.

## EXISTING SUSTAINABLE TRANSPORT PROVISION (Section 4 of WSP Report)

### 1 WALKING AND CYCLING

*“Walking is recognised as the most important mode of travel at a local level and it offers the greatest potential to replace short car trips, particularly less than 2km. **Figure 3** shows the 2km*

*walking catchment and includes key facilities in the locality including schools, healthcare facilities*

*and food stores. The walking isochrone includes Menston and northern areas of Guiseley.”*

It is the case that Menston’s shops are predominantly located along Main Street, and within 500 metres of the nearest existing access footway into Menston village (Meadowcroft) – mistakenly called “Meadowfield” in the WSP report. Dwellings which may be constructed on the proposed development site could be an additional 300 metres away. It is also true that the only health facilities currently available in Menston are within the same radius, as are the Library and the Community Centre. However, the WSP Report takes no account of the restricted scope of those shops and facilities (as assessed in a later sub-section).

The glib comment that *“Walking is recognised as the most important mode of travel at a local level and it offers the greatest potential to replace short car trips ..”* takes no account of the above factors. For the majority of Menston residents, apart from the elderly and mobility-restricted, their main weekly shop is conducted at the supermarkets in Guiseley or Otley, and there is no scope for changing this, as there is no additional retail space available in Menston. A Sainsbury’s Local supermarket has been opened on Bradford Road, Menston, but this is 1.2km distant from the proposed Bingley Road site and therefore offers no better solution than shopping in Guiseley.

It has to be unlikely that a significant number of residents of the proposed development would use a bicycle *“to substitute for short car trips”* if the purpose of those trips is their shopping, journeys to and from school. One has to wonder at the suggestion that many residents would have need or reason (other than for leisure) to access by bicycle the other towns and villages shown within the ‘Cycling isochrone’, viz. *“Burley-in-W’dale, Otley, Guiseley, Yeadon and northern extents of Shipley”*. The author of this report has clearly paid no regard to the topography of this area, which makes for challenging cycling, even in the best of weather. The proposed development site is on a hillside, which (according to the topographical analysis in the various reports into flooding and drainage issues) varies between 1:15 and 1:5. Great going downhill, but tough going on the return.

Bradford Council’s own Core Strategy Development Document (Adopted) sets out the Accessibility Standards at Appendix 3 (p 355) including that for Local Growth Centres, as proposed for Menston, employment, primary health and education, secondary health and education, leisure retail and other facilities should normally be located within 400 metres of a bus stop or 800 metres of a rail station offering specific service frequencies. **There is no reference whatever to any policy which the WSP report refers to as “a recommended 2km walking distance of the proposed development site”.**

## 2 PUBLIC TRANSPORT: BUSES

*“The development site is well located in terms of its proximity to public transport services. With footways proposed via the northern boundary onto Meadowcroft, the closest bus stop to the site is located approximately 100m to the north east of the pedestrian site access on Hawksworth Drive.”*

The information provided in this section is completely inaccurate, other than the fact that there is a bus stop on Hawksworth Drive.

*“The bus stops on Hawksworth Drive are served by bus numbers 653 and 967.*

653      *Bradford Interchange – Pool Bridge Corner:*  
967      *Menston, Cleasby Road – Leeds/Bradford Airport”*

The author has clearly drawn his/her information from the Internet and historically. To be clear: **there is only ONE bus stop on Hawksworth Drive, and it serves only ONE bus route (the 967).**

1. The 653 service was suspended during 2017, and although WY Metro states that it may be re-introduced, it is not currently operating. If and when the 653 service is restored, it will operate only one round-trip daily, the service to Bradford (from Pool in Wharfedale) departing from Menston station (only – **not** Hawksworth Drive) at 06:30, arriving Bradford Interchange 07:10, Monday to Friday only.
2. **The 967 service DOES NOT go to Bradford**, but operates in a loop between Menston station and Leeds/Bradford Airport, and only ALTERNATE TRIPS (ie. at 1-hourly intervals) progress beyond Pool-in-Wharfedale to the airport. The 967 only operates via the bus stop on Hawksworth Drive AFTER the 09:46 service Monday – Saturday, although it does travel from Menston Railway Station to Otley Bus Station and Pool Bridge Corner from 07:24 Monday – Saturday.

Thus, the statement at paragraph 4.3.3. – *“As set out above, the services which serve the stops on Hawksworth Drive provide direct routes to both Bradford and the Leeds Bradford Airport. Table 3.1 demonstrates that the bus stop has a frequency of 3 services per hour on weekdays and Saturdays.”* – is totally fallacious.

In fact, the bus stop on Hawksworth Drive facilitates one bus journey every 30 minutes between 09:46 and 16:46 Monday to Saturday (but no service on Sunday) and only in the direction of Otley Bus Station, with alternate service runs (ie. hourly) extending to Leeds Bradford Airport.

**Currently, there is NO BUS SERVICE TO BRADFORD from Menston.**

The statement at paragraph 4.3.4. is also **misleading, in an ‘optimistic’ direction from the perspective of the aspiring developer.** It presents a completely erroneous scenario.

*“Additional bus services are available from Main Street, approximately 550m from the proposed vehicular site access. These additional bus services include the bus numbers; 33 and 33A which provide services every 10 minutes to Leeds and Otley on Monday – Saturday and every 20 minutes on Sundays. “*

**That information is COMPLETELY INACCURATE:**

1. **Menston is NOT served at all by Service 33.** That travels between Leeds and Guiseley, but does not proceed beyond Guiseley to Menston. Service 33 is therefore NOT ACCESSIBLE from Menston in either direction of travel.
2. Service 33A travels a different route between Leeds and Guiseley and then proceeds to a stop on Main Street Menston, another two on Cleasby Road (one of which is adjacent to Menston Station) and thence to Otley. In relation to travel towards Leeds, service 33A is available at the Cleasby Road bus stop from 05:59 and 06:35, and then operates at intervals of approx. 20 minutes, with a journey time of 1 hour to Leeds Bus Station, **and during ‘rush-hour’ the journey time extends to 1 hour 40 minutes.** Similarly on the return journey. **For this reason, the bus service is unpopular for those who work in Leeds.**

In summary:

- there is only ONE BUS PER DAY TO BRADFORD, the 653 from Menston Station at 0630, Monday to Friday, but that’s **currently suspended**;
- Service 33 DOES NOT serve Menston at all;
- **the bus to and from Leeds is ONLY the Service 33A**, which travels a circuitous route via Guiseley, Rawdon and Horsforth (including outlying estates). The journey time is scheduled for 1 hour but regularly takes 1 hour 40 minutes at peak traffic times. This makes it very unattractive to people commuting to work in Leeds, which is why it’s not well-utilised;
- **Service 33A is therefore on a 20-minute schedule (NOT 10 MINUTES).**

It is quite amazing that the information concerning bus transport has been presented so inaccurately. This appears, however, characteristic of the entire report, as will become apparent in later sections.

### 3 PUBLIC TRANSPORT: TRAINS

*“The closest railway station to the development site is Menston railway station which is located approximately 1km to the north of the site. Menston station is located on the Leeds – Ilkley and Bradford Forster Square – Ilkley line with direct services to Leeds (via Guiseley) and to Bradford (via Shipley) stations.”*

The above information is broadly correct, but in terms of describing the facilities and capacity of Menston Railway Station, **the author of the WSP report has misrepresented the facts** in a manner seemingly designed to mislead the intending developer and the Planning Officers to believe there is ample capacity, which is simply not the case.

*“Menston rail station is equipped with cycle storage facilities for 26 spaces in the form of both cycle lockers and cycle stands with associated cycle CCTV. The rail station is also supplied with free parking facilities for 88 vehicles, a ticket office, ticket machines, refreshment facilities, and a ramp for train access.”*

1. Whilst it is TRUE that Menston Station has around 88 parking spaces, what the author of this report has not ascertained is that **those 88 spaces are fully occupied by 0745 every weekday** by existing Menston residents and/or by residents of nearby towns and villages (such as Otley and Pool-in-Wharfedale) which do not have their own railway stations. Menston serves as a commuter rail station for those who work in Leeds or Bradford. This lack of parking space already results in overspill and

parking on Menston's narrow residential streets up to as much as 500 metres away from the station, to the annoyance of residents and posing a clear danger (reported to Bradford Council) of accidents. There is no additional capacity for parking anywhere near Menston station, nor any plan or space for additional capacity, and it follows that residents of the proposed development aspiring to travel by train will have to access the station on foot or (as fatuously suggested, again without examination) by bicycle.

2. The rail station is provided with ONE ticket machine on one platform, and the ticket office is only open during specific weekday hours (0615-1900). Such "refreshment facilities" as are available amount to a single vending machine, which is in the ticket office and therefore only accessible during opening hours. The on-site café closed some 2 years ago (in late 2015) and the former restaurant closed even earlier than that.
3. The "ramp for access" to the train, is not available to passengers other than through the services of the guard on-board the train. So, a passenger would have to request that facility. Furthermore, if this is intended to signify that there is some assistance for less mobile or disabled passengers, it is completely false.

**There is no disabled access** between the platforms (one platform for trains for Leeds or Bradford, and the other in the opposite direction, to Ilkley) other than over the footbridge. This has been a matter of contention and concern for many years but there is no easy way to provide a link between the platforms apart from the installation of a lift or an underground passage, neither of which is 'on the cards' at any time in the foreseeable future.

West Yorkshire Transport Authority has recently concluded, following examination of the options, that there is no prospect of constructing a multi-storey car park on the existing station parking area, by reason of access difficulties and severe environmental constraints. In the circumstances, the fact has to be faced that Menston Railway Station's parking facilities are already at capacity and causing serious overspill into residential areas. There is no available land anywhere close to Menston Station.

As regards the suggestion that prospective residents of a new development on Bingley Road might access the railway station by bicycle, the author of this report has failed to take account of the fact that the route to Menston's facilities and the railway station is on a hillside which varies in gradient (according to the geophysical report) of between 1:15 and 1:5. Therefore, accessing the railway station and its allegedly impressive collection of cycle storage racks necessitates a downhill journey of 1km, and the return journey requires the same distance but rising by 55 metres. This would be quite a pull for even the fittest cyclist, and certainly more than could be expected of someone wearing clothing suitable for employment, carrying anything, less than completely fit, older or with any form of disability.

**These statements are a perfect example of failure to examine the facts 'on the ground'. As such, the report advances an assessment of Menston and its railway station which is completely misleading.**

#### 4 MENSTON'S EDUCATIONAL, SOCIAL AND HEALTH FACILITIES

- a) ***“Education provision – three primary schools and one secondary school are situated within the recommended 2km walking distance of the proposed development site. These educational facilities include; Menston Primary School located off St Peter’s Way, Tranmere Park Primary School located in Park Gate, and Hawksworth C of E Primary School situated in Hawksworth. The only secondary school located with a 2km distance of the development site is St. Mary’s Menston Catholic Voluntary Academy which is situated on the A65 Bradford Road;”***

Once again, the author has either not done his/her ‘homework’ or is intentionally trying to hoodwink the prospective developer who commissioned the report, their Agent or the Planning Officers into believing that Menston has adequate educational resource to accommodate the expected increase in the number of school-children from occupancy of the Bingley Road development site.

Leaving aside the question of how safe it might be for children from that development to walk to school (as is suggested), it is irresponsible to propose that primary school children (ages 5 to 11) should attend any school other than Menston Primary School. That school is, however, already at capacity. The alternative primary schools which are suggested – *“within the recommended 2km walking distance of the proposed development site”* – at Tranmere Park (Guiseley) and Hawksworth (in Hawksworth village) are self-evidently **completely inappropriate** to anyone who knows them and where they are located.

Tranmere Park Primary School (which is in Leeds City Council’s educational authority area, not Bradford), **is located on Ridgeway, Guiseley, not Park Gate** and is only accessible via the busy A65 and then the shortest route is along Bradford Road at Guiseley (the A6038) turning into the Tranmere Park estate at Moorway and up the hill to the school. The walking or cycling distance is 1.7 miles (2.7km), and would involve a steep hill. Google maps indicates that the walking journey time (for an average adult) is 34 minutes. It is farcical to suggest that this is a suitable and accessible journey for a child of primary school age. Transporting a child to that school is obviously going to involve a car journey, exactly what this Interim Travel Plan purports to avoid. Tranmere Park School is indicated to be at or technically above capacity.

Hawksworth Primary School is a Church of England (faith) school located in the village of Hawksworth and certainly NOT within a 2km walking distance of Menston other than cross-country. The shortest distance by footpath or road is 1.7 miles (2.7km) via the moorland route which has no footpaths and is used as a rat-run by traffic trying to avoid the A65 and A6038 routes into Bradford and beyond. That route would be extremely dangerous: it is not suitable for adult walkers and no responsible parent would contemplate it. The alternative route is via the footpaths along the busy A65, then turning up Thorpe Lane at the White Cross roundabout – a steeply rising road not supplied along its entire length with footpaths – onto Hawksworth Lane and to the school on Main Street. That journey distance is 2.5 miles (4km), clearly beyond reason for a primary school child and certainly an unsafe option by reason of the heavy traffic. The school is tiny ... extended progressively but still geared to the acceptance of children from this small village. The school falls within Leeds City Council’s regulatory authority, not Bradford.

So, in summary:

**Menston has only one primary school.** The others within Bradford District are: Burley & Woodhead, Burley Oaks and Ben Rhydding. All are more than 2km distant. Pupils at the other schools mentioned in the WSP report would be obliged to apply to Leeds City Council for provision, and would not have first choice. Menston Primary School has no additional places, and the schools in Guiseley, Burley and Ben Rhydding are overcrowded or full, mainly as a consequence of recent housing development.

Turning now to secondary school provision, the author is (at last!) correct in one statement: only one secondary school is located in the area of Menston Parish and that is **St. Mary's Catholic Voluntary Academy. The name itself should be a give-away of the fact that is not universally open to applications.**

St. Mary's is an academy and a faith school. Thus, it accepts Roman Catholic pupils from a wide catchment area and has the freedom of an academy NOT to have to accept children based on proximity. St. Mary's is therefore not generally accessible to Menston's secondary-school-age children. Similarly, there is limited access to Ilkley Grammar School, which has academy status. Prince Henry's Grammar at Otley comes within the authority of Leeds City Council, not Bradford, so is not generally accessible to Menston's children. By arrangement with Leeds City Council, the majority of these Menston children go to Guiseley School, 3.3km distant.

**Any study of the educational provision in Menston which had looked at the situation 'on the ground' and not on the Internet would have ascertained these facts and NOT provided misleading conclusions to the intending developers or their agents.**

**b) *Health facilities*** – include Menston Medical Centre and Menston Pharmacy, which are both located within walking distance of the site. Additional health facilities such as opticians and dentists and located in Guiseley, Otley and Ilkley which can be accessed via bus, rail and cycle;”

1. Menston Medical Centre is already oversubscribed, struggling to recruit an additional GP and endeavouring to service its current registered patients from its other surgery at Park Road in Guiseley. Hence, there is no capacity to accept a further potential 600 patients from this proposed development.
2. Additional medical facilities were promised to be delivered on construction of the development at High Royds, commencing 2007, but never materialised.
3. All the facilities mentioned in the Interim Travel Report **are accessible in Guiseley** but that does require travel to Guiseley and not 'on the doorstep' in Menston.

**Which means that residents on the proposed new development are not going to find their health needs catered for in Menston, and that will not meet the stated objectives, ie. “to reduce the impact and frequency of car travel ... reduce the impact of the development on the local road network (and) .... improve the health and well-being of the residents... .”** For any of these facilities, it will be necessary to visit Guiseley.



**c) Social and recreational provision**

“Kirklands Community Centre, Highroyds Sports and Social Club, Crompark Cricket Club, and a number of recreational grounds are located within a reasonable walking and cycling distance of the site.”

Whilst it is true that Menston has a park, with some recreational facilities (a tennis court and football pitch), and Kirklands Community Centre will hopefully transfer to community ownership, all the other facilities are both limited in scope and subscription. Menston does have its own Cricket Club and is working to develop a youth team, but there are few facilities open on the village on a regular basis for recreational activity. It is therefore **wrong to portray this community as a centre for lively recreation and social activity for all age groups**. Younger people are a minority in the community thus there has been no concerted drive – and no funding – to extend socially-inclusive sports and recreational activity, and there is little realistic prospect of this situation changing in the foreseeable future, particularly as new development is bringing in commuters, and not those who see the village community as a key part of their stable platform of life. Many of the clubs, societies, pubs and sports teams are currently struggling to survive, and are maintained by a small number of mainly elderly, permanently-resident, activists who volunteer.

**d) “Employment** – there are a number of employment areas located within a 5km distance of the proposed development site. These areas include Millfield Industrial Estate in Yeadon, Westside Retail Park in Guiseley, Guiseley Retail Park located in Guiseley, and Wharfebank Business Centre located in Otley are within the recommended cycling distance of the site and are accessible via public transport.”

**The author of the WSP report is trying to create the illusion of a vibrant context of work and leisure in the proximity of this proposed development - a completely false picture.**

**Menston** village (in evidence gathered in the Neighbourhood Plan Preliminary Survey during 2017 by Menston Parish Council) has a total of only 70 ‘businesses’. Of these, 40 are sole traders (effectively self-employment operating from home or on a mobile basis).

**Menston has only 6 businesses which employ 10 or more staff**, as follows:

The largest employer locally is Menston Primary School which employs a total of 29 full-time and part-time staff. Clearly, the majority are specifically qualified (teachers and support-workers), and only 7 current members of staff are Menston residents. The second largest employer is Meadowlea Children’s Home, operated under the auspices of the City of Bradford MDC, currently employing 24 members of staff (18 full-time and 6 part-time) of whom none live in the village. Next is the Co-op store, employing 18, of whom 6 are full-time employees and, of the total, only 7 are Menston residents. The JCT600 garage reports employing 14 members of staff in Menston, 10 full-time and 4 part-time, and only 2 are Menston residents. With the exception of a Receptionist and a Cleaner, these employees possess specific skills and experience (sales, engineering, technical and managerial). Abbeyfields Care Home employs a total of 17 staff, of whom 9 are full-time and 5 live in the village. The recently-opened Sainsbury’s Local on Bradford Road did not participate in the survey but apparently employs a total of 14 staff, most of whom work part-time hours.

With the exception of the retail stores, all these businesses are highly specialised employers which engage specifically-skilled staff.

There are a handful of small businesses, such as the Londis store/Post Office, the deli, Ribston Pippin Estate Agents and the Village Bakery, which are basically family-run but may employ a few part-time or casual staff at busy periods.

Other commercial businesses in the village include the three pubs, Parmley-Graham (electrical wholesalers), Ride-Away Taxis and American Golf (6 employees, of whom 3 are full-time). As far as could be ascertained by the survey, none of the above employ any village residents.

The sole traders are predominantly not employers, but may – as in the case of the several hairdressing and beauty salons – offer a rental chair to another self-employed person. Self-employment, possibly with an employed partner or single employee, offers 124 jobs in Menston.

In aggregate, Menston’s employing organisations provide jobs for only 300 people and of these only 108 are currently Menston residents.

Few of the jobs in Menston, apart from the minority of specialist skilled occupations, offer the opportunity for substantial earnings. The majority of any residents of the proposed new development will have to do what almost everybody else in Menston does – COMMUTE TO WORK – in Leeds, Ilkley or (less commonly) in Bradford. Those residents who are professionally qualified may work farther afield, in York or Harrogate for example, to which they commute daily by car.

Bradford Council’s own data relating to population, employment and commuting to work are incorporated into the Wharfedale Ward Economic Profile, October 2010 (not subsequently updated, as far as can be ascertained).

- This shows that the whole of Wharfedale Ward has only 1,872 jobs (currently filled or potentially available if becoming vacant). However, there are 6,816 members of Wharfedale’s population of working age. So, there’s only 1 job in Wharfedale for every 3.6 residents.
- “Nearly half of employed residents (49.3%) commute outside of Bradford district to work. This is the highest of all wards within the district. 37.7% of residents work in Leeds.”
- “The average distance travelled to work by Wharfedale ward residents is 13.9km, higher than the district average of 10.1km. A high proportion (75.8%) of journeys to work by Wharfedale residents are by car, higher than the district average (69.2%). Only 4.2% of the journeys to work are by bus, but a higher than average proportion are by train (12.0%).” That’s because there are no direct buses to Bradford, and the train is the only public transport facility which can replace a car journey.

**It should be obvious to the author(s) of the Interim Travel Plan, if they had done any ‘groundwork’, that Menston offers few opportunities for employment and even fewer for the sort of earnings which would be required to fund a mortgage and support a family in one of the residences likely to be offered on the prospective development.**

The best illustration of this is the Chartford Homes site, developed on Bingley Road on an adjacent piece of land. Chartford Homes have constructed 11 dwellings on this site at prices upwards of £650,000, in the belief that Menston and Wharfedale would appeal to affluent buyers. Although those properties have been on sale “off-plan” for more than a year, only three have been sold, and not one has been taken in the past 6 months.

As to employment locally outside Menston village, the author of the WSP report suggests that suitable employment may be found at “Millfield Industrial Estate in Yeadon, Westside Retail Park in Guiseley, Guiseley Retail Park located in Guiseley, and Wharfebank Business Centre located in Otley.” The author clearly knows little or nothing about these potential sites of employment or what they comprise in terms of employment opportunities. The names themselves should be indicative ... the jobs are either **retail or industrial** and, short of managerial roles, **unlikely to provide an income adequate for residency on the development proposed by Bellway Homes**, even in one of the supposedly “affordable” dwellings. They are only likely to provide sources of a supplementary income.

**The author’s research has been totally inadequate.** He/she has overlooked one of the most important potential sites of employment in the entire area, namely Leeds Bradford Airport. There are 10 commercial airlines operating out of LBA, plus a charter and training flight operators, an aviation engineering base, freight handling, passenger services and subsidiary operations providing insurance, catering, baggage handling, taxi and other transport operations, car parking and security services. The airport has some ambitious plans for expansion in the period to 2030, even though Monarch Airlines collapsed in October 2017, unable to maintain profitable operation despite increasing passenger numbers. There is real doubt whether LBA can achieve its ambitious targets for growth in the current competitive trading conditions, but there is no doubt that LBA is a place of volume employment, a recent estimate suggesting that 2,700 people are employed there in all the available sectors. Many of those jobs will, of course, be part time, and the airport is subject to restricted flying hours overnight.

**Even if employment was available at LBA to the residents of the proposed Bellway Homes development, it has to be recognised that the LBA site is not accessible over a 24-hour period by any of the alternatives to use of a car.** The airport is approx. 5 miles from the proposed development site, there are no direct routes over the moorland which separates Menston and the airport site (nominally at Yeadon), and the terrain is such as to necessitate an ascent, over the distance, of some 100 metres in altitude. Attempts by airport-based companies to encourage their employees to cycle to work have been frustrated by the challenge of such a journey by bicycle and by the fact that the only public transport direct from Menston to LBA is the 967 service (see earlier) which does not connect from Menston until the 08:22 departure, arriving at 08:58 and too late for the majority of jobs at that location.

Thus, even at the site of employment which offers potentially the greatest opportunity for employment relatively locally, the WSP report’s stated objective of minimising car travel is defeated.

In any event, despite the availability of the Bradford District-Wide Transport Study produced by Steer Davies Gleave in October 2010, **the author of the WSP report has chosen to use some spurious data and hypothetical constructs for the forecast of traffic from the proposed development.**

The WSP report suggests that the development would generate approximately 100 additional daily journeys on the road network during peak hours. It takes as its basis the BRADFORD travel modal splits, failing to recognise that Menston is remote from Bradford, and very different to Bradford in its transport and travel characteristics. The authoritative **Steer Davies Gleave report** used the Mouchel model to forecast the number of daily two-way trips per household from new development in Bradford District, predicated on a model of 10% flats and 90% houses (the current mix for Bradford, but NOT FOR MENSTON). On this basis, this authoritative report by traffic management experts forecast that each new dwelling would result in trip-generation of 7.6 round-trip journeys per household per day plus 10% "NHB: "non-home-based trips". For the forecast/planned 133 dwellings on the Bingley Road site, that would mean:

$$\begin{aligned} 3.6 \times 2 \times 1.1 &= 8.36 \text{ trips per household/day} \times 133 \text{ households} \\ &= 1,112 \text{ trips to and from this planned development per day.} \end{aligned}$$

Insofar as the WSP report provides no indication of any reference to the Steer Davies Gleave report, nor any other authoritative model of travel forecasting, it has no place in "evidence".

**It is simply unprofessional to advance a forecast of traffic as the WSP report does,** based on a hypothetical model which is not validated, not based on the specific locality or the types of dwelling, and unsubstantiated. To suggest, as the WSP study does, that only around 70 vehicles will leave the proposed development site at peak hours (for schools and employment) daily, from 133 properties and a capacity of 200 cars, beggars belief. It also pays no attention to the NHB trips referred to in the Steer Davies Gleave report, which therefore underestimates the traffic generation by a further 10%. **The WSP report is completely unreliable. It appears to have been written to support the proposition for development rather than to report in a professional, unbiased fashion.**

In promoting the WSP report and in its own 'evidence' to Bradford Council, the Agents for the intending developer (Johnson Mowat) refer to local concerns about traffic on Bingley Road, in Menston and on the road network to centres of employment in the following terms:

Source: "FULL PLANNING APPLICATION .... RESIDENTIAL DEVELOPMENT OF 133 DWELLINGS .... BINGLEY ROAD, MENSTON .... STATEMENT OF COMMUNITY INVOLVEMENT, Johnson Mowat, 27 July 2017

- "5.4 Concerns regarding highways were one of the most frequently raised issues by residents. Reference is made on multiple occasions to the volumes of traffic at peak times which use Bingley Road as a 'rat run'.
- 5.5 Concern over existing congestion on the A65, Bingley Road and onto Main Street, and that the roads are unable to cope with an increase in traffic, leading to a rise in pollution were expressed. The issue of public safety on Bingley Road was mentioned as well as pedestrian access on pavements. "

The Principal Highways Officer of Bradford Council (Simon D'Vali) attended a meeting of Menston Parish Council on 27 July 2017 (the same date as publication of the above document by Johnson Mowat), as on many occasions over the last 5 years. He stated that he recognised that Bingley Road, the corner with Cleasby Road and the junction at the bottom of Bingley Road where it meets Main Street are all serious traffic hazards. Numerous complaints have been made over recent years which he acknowledged. Although there

have been accidents, none has yet resulted in death or serious injury. So, he proposes to introduce a new Traffic Regulation Order in the hope of slowing traffic on Bingley Road. In January 2018, changes were made to the highway and to the traffic priority in the hope of addressing the inherent accident risk.

But, in relation to these concerns, Johnson Mowat say, in effect “We’ve had a report done (by WSP) which says that everything’s OK!”. Examination of the facts indicates that this is not the case.

“5.6 **A Transport Assessment prepared by WSP** which forms part of the application documents and conclude that the purpose built site access junction provides sufficient capacity. **It is predicted that the proposed development would result in a negligible impact on all junctions within the study area. Overall it is considered that the site is in a suitable location for the proposed residential development and the proposals could be accommodated without resulting in a detrimental or severe impact on the network.**”

**There is nothing whatsoever of an evidential nature to support either that assertion or to underpin the WSP report, which Menston Parish Council views as unprofessional.**

We take the view that the reportage by WSP in respect of transport, travel and facilities in Menston is unprofessional and likely to mislead concerning the capacity of Menston to accommodate housing and the related increase in residency numbers who will be obliged to travel to employment and education.

### **FLOODING AND DRAINAGE, and the Envireau Report (November 2017)**

Regardless of the evidence presented, the actuality of flooding in Menston and other villages up the Wharfe Valley, and knowledge of the inadequacy of Menston’s Victorian drainage system, the prospective developers attempt to discredit this evidence and to offer new reports and assessments to ‘prove’ that building on the moorside above Menston on Bingley Road will not exacerbate – or may actually ameliorate – the known risk of flooding both on the proposed development site and on nearby streets.

The developers (not just Bellway Homes, but Taylor Wimpey before them) endeavour to ‘trump any card’ or dismiss any evidence of flood risk or drainage inadequacy, and try to convince the Planning Officers that the photographic, video, topographical, LiDAR, geophysical and expert evidence relates to an exceptional event. They also continue to provide reports which insist that all these matters, even if they have an evidential base, can be overcome by an imaginative drainage system.

The latest such ‘evidence’ is presented by Envireau Water, and dated November 2017. This, in the opinion of the Parish Council - and having sought expert opinion from JBA Consulting (held to be the most proficient and competent of UK flood and drainage consultants, and who have previously had the confidence of CBMDC in providing expert evidence for the Council) – is a thinly-disguised attempt to support the developer’s aspirations and underpin the reportage previously supplied by Eastwood & Partners. In so doing, it attempts to detract from, deflect attention from or throw into question the reports as supplied by Sirius Geotechnical, Dr Duncan Reed, and JBA.

Unfortunately, Bradford Council has not completed its Strategic Flood Risk Assessment nor does it have any technical resources of its own proficient to undertake an analysis of the

water flows from all sources, nor the effect of a combination of saturated soils and heavy, persistent rainfall upon the cumulative flow of groundwater and surface water. The Council, to date, has relied upon material produced by The Environment Agency several years ago, at which time the land in question was assessed as being in Flood Zone 1, which refers only to fluvial water.

The Environment Agency specifically says: “Flood zones have been created by the Environment Agency to be used within the planning process as a starting point in determining how likely somewhere is to flood. However, they only refer to flood risk from rivers or the sea, and not all rivers are included. The most important thing to remember is a flood zone is predominantly a planning tool and doesn’t necessarily mean somewhere will or won’t flood.” [Editor’s underlining]

The Bingley Road site is at least 1½ miles ‘as the crow flies’ from the River Wharfe and (at the lowest point on the proposed development site) at least 100 metres of elevation higher than the Wharfe. There is not the slightest prospect of the Bingley Road site being affected by fluvial water (ie. from river or sea sources).

Bradford Council did include in its Preliminary Flood Risk Assessment (published 2011) a map of the “Areas Potentially Susceptible to Groundwater Flooding” [Figure 5.2 of that report, attached] but has not, it seems, referred to more recent mapping and evidence. The Environment Agency has produced more up-to-date and comprehensive mapping of groundwater which is included in the Sirius (2017) report.

At page 95 (of 226) in the Sirius report, a map is shown, drawn from British Geological Survey data, of how the Bingley Road site relates to Menston and the surrounding moorland, and **the site which Bellway Homes seeks to develop is clearly shown being highly susceptible to groundwater flooding at surface level.** Whilst the developer may choose to ignore this evidence or to imagine he can implement measures to mitigate the effects, **this is evidence that Bradford Council as the Local Lead Flood Authority cannot ignore.** [A copy of the relevant page from the Sirius report is attached.]

As can be seen from this EA map there is a line (in light blue) across the Bingley Road site where the groundwater “potentially emerges at the surface” and flows down the slope. This process has been demonstrated by photographic evidence on several occasions as given in the JBA report, Appendix H and the 3 photographs recorded at different times which are also attached. We see this as incontrovertible evidence. The photographs of flooding, precisely in that area [as attached] confirm this.

To compound this problem of using outdated evidence, Bradford Council persists in regarding any potential site as developable unless it falls within Flood Zone 3. No regard is currently paid to flood risk from sources other than fluvial, unless the evidence is persuasive, and in this case the developer continues to advance reports, which it commissions - and which are not independent - to persuade the Planning Officers that development will be safe or that the flood risk can be alleviated.

The developer is prepared to pay for the preparation of reports favourable to its case, in the expectation that it will cover the costs if and when the development is approved, and in the meantime it can engage in a process of attrition knowing that the only opposition comes from a worried community which has limited resources.

**The report from Envireau Water appears to Menston Parish Council to be only the latest example of reportage designed to support the developer’s aspirations.** Furthermore, their report lacks the technical rigour or the analytical and practical investigative processes as undertaken by Sirius and JBA. **The following pages reflect the consideration of several members of Menston Parish Council and a comparison of the submissions of Envireau Water and JBA, which, as a statutory consultee, we now put**

**to Bradford Council for inclusion in the evidence relating to the relevant Planning Application 17/04591/MAF or any which may follow it in respect of the land at Bingley Road.**

The Envireau Report (which they themselves call a “Drainage Review”) is circumscribed in its opening remarks, viz.:

“A key principle of drainage design for new housing developments is to prevent an increase in flood risk to existing properties and infrastructure, rather than totally eliminate risk.

In reviewing the Flood Risk Assessment (FRA) and drainage scheme prepared by Eastwood & Partners for Bellway Homes’ planning application at Land at Bingley Road, Menston (“the site”), Envireau Water has focussed on the effectiveness of the proposed drainage scheme to collect and convey surface water and groundwater without increasing downstream risk and, where possible, provide betterment over the existing situation.”

Envireau Water has further focused its efforts to meet a specific requirement of CBMDC, as described:

“Bradford MDC also acts as the local lead flood authority (LLFA) and has assessed the FRA and drainage scheme. In a Memorandum dated 11/09, Bradford MDC concluded that the level of detail within the FRA is insufficient for them to assess the impact of the development and in order to do so, responses are required to three specific comments relating to the proposed groundwater and surface water management at the site.”

Thus, in admitting that its own Flood Risk Analysis is inadequate, Bradford Council is in effect pitting the resources of the substantial developer, and any consultancy the developer chooses to engage, against the resources of this small community. This cannot be fair or reasonable by any stretch of the imagination.

Menston and Burley Woodhead Parish Council (to give this body its full title) is aware of a substantial number of properties in Menston where flooding has occurred over the years, and in some cases repeatedly, but the Parish Council has no authority in terms of recording or acting upon that knowledge. Several instances have been recorded photographically, including video, and these recordings have been passed to Bradford Council as a part of the Parish Council’s ongoing representations in this matter.

In all the circumstances, and given that Bradford Council engaged JBA Consulting to undertake its Strategic Flood Risk Assessment, it is puzzling that the Planning Dept., is reluctant to accept the evidence presented by JBA as authoritative.

## COMPARISON OF ENVIREAU AND JBA CONSULTING REPORTS

No member of the Parish Council purports to claim expertise in the matters which the various hydrogeological or technical reports contain, nor can we offer any more than a view on the welter of information which has been provided over the years since this site on Bingley Road was included in the RUDP. Those reports include, in chronological order:

<b>Report by</b>	<b>Date</b>	<b>Commissioned by</b>
Sirius Geotechnical	December 2009	Taylor Wimpey
Eastwood & Ptnrs	January 2010	Taylor Wimpey
JBA Consulting	January 2013	For public enquiry (MAG)
Dr Duncan W Reed	December 2014	CBMDC
WSP	February 2013	Taylor Wimpey
Sirius Geotechnical, Pt 1	February 2017	Bellway Homes
Sirius Geotechnical, Pt 2	July 2017	Bellway Homes
Eastwood & Ptnrs	Sept 2017	Bellway Homes
JBA Consulting	August 2017	Menston PC
Envireau Water	November 2017	Bellway Homes
JBA Consulting	January 2018	Menston PC

We can, however, see some significant areas of difference between the reports of Envireau Water and JBA Consulting, particularly as regards the potential flow rate of water down the moorside and the volume of water which would have to be stored to avoid flood risk to current (pre-development) properties in Menston.

In essence, Sirius and JBA say that the various underground strata are interconnected and collect water (into a groundwater flow) all the way from Ilkley Moor, whereas the Envireau Water report states that the groundwater flow on the site is superficial, comes from only one of the strata, and that the problematic water flow is surface water, and the intervention/storage requirement is only from direct surface water capture.

The JBA report states:

### 4.1 Estimation using Annual Average Recharge

The following assumptions allow for an approximate estimate of the potential groundwater discharge rates at the site:

- The approximate area of the likely feeder catchment (delineated from LiDAR) is 900,718m<sup>2</sup>.
- Recharge to the catchment is assumed to be 450mm/yr (scaled for an average rainfall of 1,000mm: BGS Technical Report WA/96/1)

Based on these assumptions the groundwater discharge on site could yield approximately 1,110m<sup>3</sup>/d (assuming rainfall is evenly distributed).

The estimation assumes that rainfall is distributed evenly throughout the year. However, a high rainfall event can be attributed to a few, or even just one large daily rainfall event (storm) occurring.

If a prolonged rainfall event were to occur it is possible that the volume of groundwater discharging to the site could be significantly greater than this.



According to these calculations, if 50mm of rain, which is one twentieth of the annual rainfall, were to fall in 24 hrs, following the recharge of groundwater due to persistent rain, then the potential groundwater which emerges and flows on the site will be ...

$1,110 \times 365/20 = 20,260$  cubic metres in 24hrs., at an average rate of 235 l/s.

This calculation was verified in the JBA report in section "4.3 *Observations of historic flows on site*" and which have occurred on 21st January 2008, 24th September 2012 and 26th December 2015. The figures from Envireau Water of water flows from the site are less than one-tenth of those set out in JBA Consulting's reportage.

Let us be clear: the members of Menston Parish Council are long-term residents of this village and, over several years, we have seen increased flooding in the village, both in frequency and in the effects and damage. Those of us who have lived here for many years recognise that three reservoirs have been decommissioned (those being located on Hillings Lane, near the top of Moor Lane; High Royds Hospital site; on the land of Brookleigh Farm, east of the railway line and behind Halstead Drive). Those reservoirs originally stored and provided water for Menston were all closed, and the water is now imported into the district. In addition, when High Royds Hospital closed, its own extraction facilities were decommissioned, and that represented a huge volume of water. We consider it very credible that, due to cessation of groundwater extraction to supply these reservoirs, this has led to a rise in the local water-table, and when we have waterlogged land on the moor, high groundwater and a lengthy spell of heavy rain, areas of the village flood.

It is also the case that Menston's drainage system is not fully mapped, and that many culverts and watercourses are blocked even where they are known, and that the Victorian drainage system cannot deal with the flows of water. This has been shown convincingly on numerous occasions.

We have seen the road surface erupt several times at Lane Ends (Derry Hill and Main Street junction), flooding on Main Street near the Library, gardens inundated in Hawksworth Drive, Moorland Avenue, Mount Pleasant, and cellars flooded on Main Street, Dicks Garth Road and Walker Road. Not all residents will admit to the District Council that their property has flooded but this was an issue raised by 35% of the 2,000 respondents to the original LDF. We have also witnessed the closure of the A65 between Menston and Burley on several occasions, emergency crews being called to deal with vehicles stranded in the flood water, and the Police having to divert traffic. We have seen the railway line closed because the track-bed has been washed away. We have seen vast areas of land along Menston Old Lane/Burley Old Lane turn into flood plains, and we understand the distress and financial loss to our neighbours.

None of the flooding events in 2008, 2012 and 2015 can be classified as 1 in 100 year events: in that they are 3 serious events within 10 years.

We believe it is our responsibility as a local authority to take a cautious view of the contentious elements, and take the worst case scenario for future flood risk as the guideline for decision-making. To do otherwise might place property and lives in jeopardy, and could well be seen as a negligent act on our behalf. We urge Bradford Council to adopt the same responsible perspective. It is a duty upon CBMDC to evaluate all Local Flood Risk and thereafter take responsibility for the outcome of the LFRA.

**Thus, in the absence of comprehensive documentation of flooding and drainage incidents in Menston, in recognition of the fact that the PFRA and the SFRA have not progressed beyond Stage 1 (Final Draft, February 2014), and that the City of Bradford MDC has selected JBA Consulting as its preferred advisor on the matter of flooding and drainage, we urge the Council to endorse JBA Consulting's perspective on the**

**site at Bingley Road and finalise this matter without yet more expense and delay by rejecting the Planning Application for the development of this site, in the interests of avoiding continuing concerns for residents of Menston (current and future) about associated flood risk.**

Approved by Menston and Burley Woodhead Parish Council

Endorsed by: Councillor Dale Smith  
Councillor Jackie Whiteley  
Councillor Gerry Barker  
Philip Davies MP  
Menston Community Association

## OUTDATED (2011) MAP OF AREAS POTENTIALLY SUBJECT TO GROUNDWATER FLOODING IN BRADFORD DISTRICT

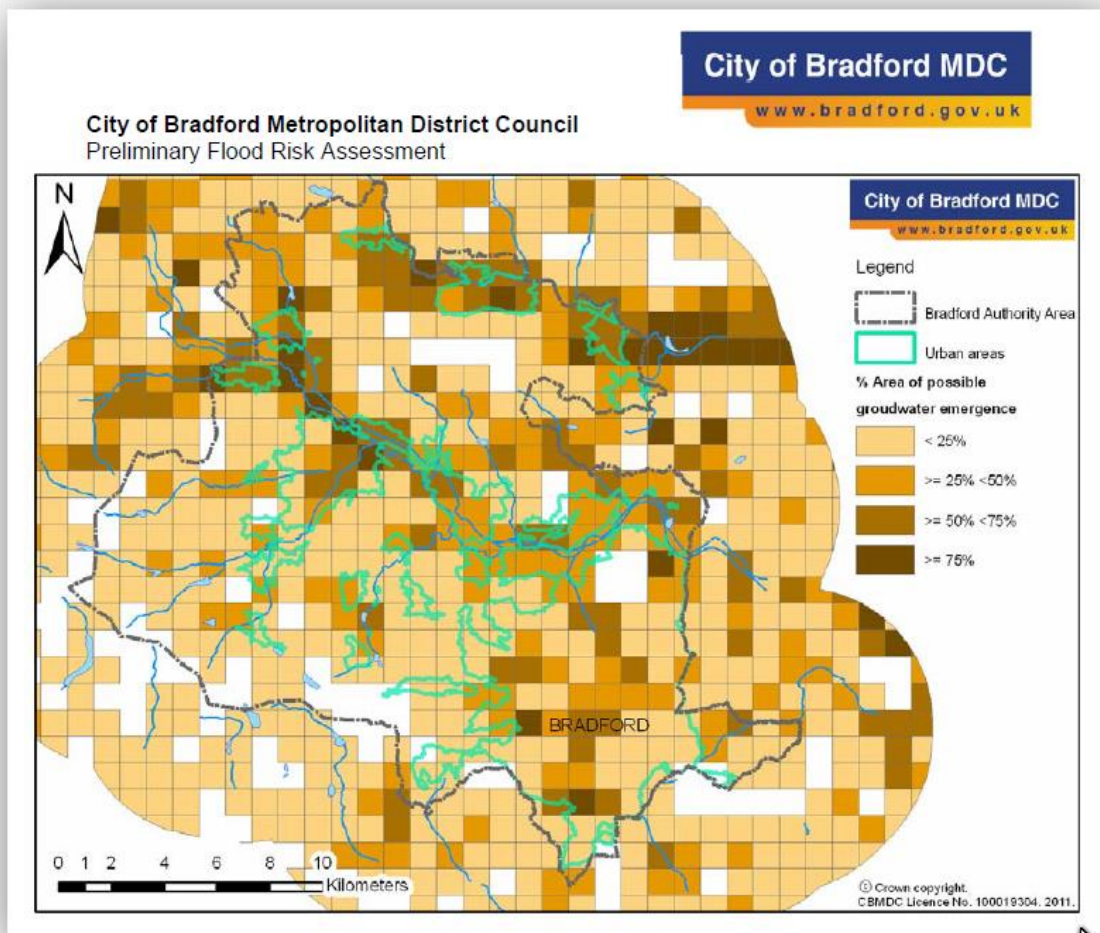
Whilst the mapping below shows Menston to be susceptible to groundwater flooding, a more comprehensive and more localised mapping system was introduced by The Environment Agency and included in the Sirius report dated July 2017.

### Groundwater Flooding

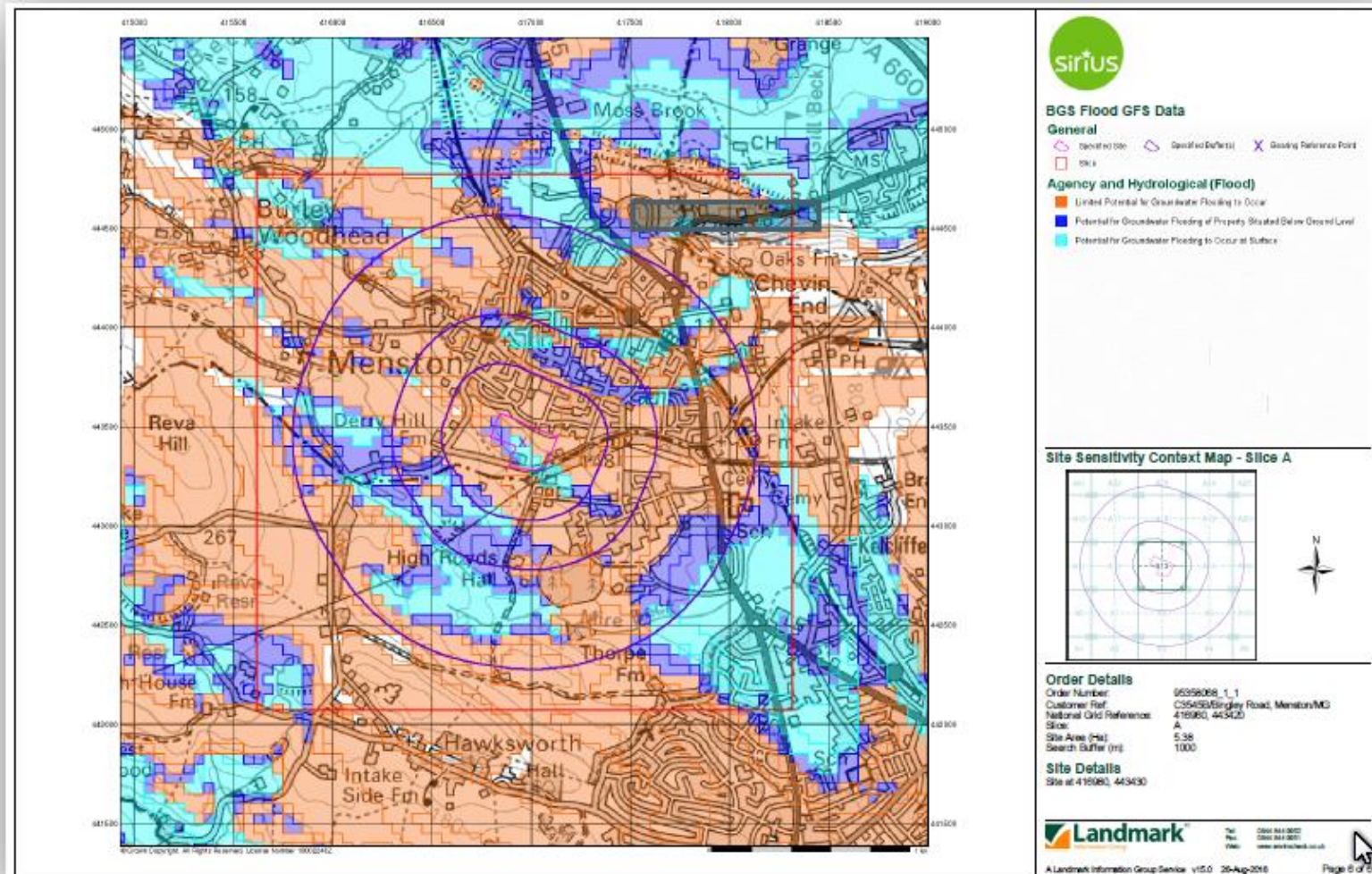
The Environment Agency's national dataset, Areas Susceptible to Groundwater Flooding, has been used to form the basis of the assessment of future flood risk from groundwater. See Figure 5.2.

There are no local records of significant groundwater flooding available other than in relation to cellar flooding as mentioned in Section 4.1.

Figure 5.2 Areas Potentially Susceptible to Groundwater Flooding.



**MOST RECENT GROUNDWATER MAPPING (British Geological Survey & Environment Agency),  
as included in Sirius report dated July 2017.**





**PHOTOGRAPHS OF FLOODING EVENTS ON BINGLEY ROAD, MENSTON (#1)**



NOTE: This groundwater emergence coincides exactly with the area of such risk shown on the BGS and Env. Agency map provided in the Sirius report of July 2017.

**PHOTOGRAPHS OF FLOODING EVENTS ON BINGLEY ROAD, MENSTON (#2)**





**PHOTOGRAPHS OF FLOODING EVENTS ON BINGLEY ROAD, MENSTON (#3)**

