

Bradford Shipley Road Scheme

Report accepted by Shipley Constituency Labour Party 6th Nov 2020

Appendices: A Further detail. B. Timeline

Appendix A. Further detail

Members of the working party (Vick Jenkins, Ludi Simpson, Sarah Cartin, Rachel Hesselwood, Kath Jackson – all those who volunteered) talked to councillors affected by the changes, to the Council Executive member and the Council officer in charge of implementing the scheme, to people and organisations that have responded to the scheme including Clean Air Bradford and Shipley Town Councillors, and to the Shipley CofE school head and parents. Our thanks go to all who spent their time informing us of the scheme and their understanding of it. We have read the report of the 2018 community consultation on the Branch Junction, and many of the available official documents for the scheme.

This appendix sets out in more detail the four concerns listed in the report recommendation: the impact on Bradford and Shipley residents, the lack of evidence presented to support the scheme's objectives, the need to treat the scheme within a response to the climate emergency, and the nature of education and campaigning to achieve residents' needs.

Impact on residents:

- a. The scheme is part of a 1 billion-pound West Yorkshire Plus Transport Fund to provide efficient economic growth. The report on the proposed scheme for Bradford-Shipley road traffic that led to its inclusion in the fund has not been made public, but [its primary impact was "Access to new development"](#), supporting 960 jobs through housing and commercial development, and access into Bradford and the motorway network "from Airedale and beyond".
- b. The 'Bolton Woods Urban Village' (<https://newboltonwoods.com>) aims for a thousand new houses, below Poplar Farm. In total, the scheme aims to "facilitate 3,200 new dwellings" along the route (WYCA Dec 2019). The current housing at Poplar Farm has no buses and housing mostly with two or more cars that crowd the pavements. There has been no insistence on making the new housing sustainable without addition to pollution, for example through buses, car club, electric charging points, dedicated cycle/walk ways, and ensuring local facilities within walking distance.
- c. There appears to be a focus in the scheme for through traffic on Canal/Valley/Otley Roads. Although the scheme originally emphasised new housing, and although its current presentation focuses on cycleways and greening the valley, the gains are presented only as increased traffic capacity and reduced journey times. Some through traffic is needed to get between the Bradford area and the Skipton area, but there is no need to assume that it must involve more cars and freight rather than public transport, more efficient car use, more cycling, and diversion to routes away from bottlenecks.

- d. Larger roads with more traffic tend to discourage active travel (walking and cycling) and to socially separate communities which the roads drive through. While improving community safety and security in Manningham is an aim of the scheme by reducing traffic volume, the extra lanes planned for Canal/Valley/Otley Roads are likely to have the opposite effect.
- e. The impact of greater volumes of traffic on the bottleneck of Shipley beyond the scheme itself is not addressed at all. This includes the already congested stretch from the Branch junction (where Otley Road and Bradford Road meet) to Cottingley, and all the other routes through Shipley including along Saltaire Road and through Saltaire. To focus on the stretch up to Shipley and not address the rest of the through route up the Aire Valley is acceptable only if it does not create a negative impact on those other areas. The interests of all residents and businesses impacted by the scheme must be considered.
- f. The air quality in many Bradford schools is already acknowledged as above the recommended limits, including Shipley CofE, Wycliffe and Saltaire primary schools. The scheme has an aim of improved air quality but no statement about how this will be measured or achieved. In residents' interests, air quality must be improved for each school, not for the average over the whole scheme. Measurement must include both nitrogen dioxide and particulate matter that cause ill health. The impact of air pollution on health and mortality is well recorded (reports [in the Guardian](#) and [from the British Lung Foundation](#)). [Research by the Bradford Institute of Health Research](#) estimates that bad air quality is responsible for 254 deaths in the District annually preventable by reducing particulate matter well below international guidelines.
- g. Councillors for areas affected by the scheme outside Shipley have focused on their desire to reduce congestion, for example to move traffic out of Heaton and Manningham, while removing traffic jams from Canal/Valley Roads.
- h. In the report of Community Consultation about the Branch Pub junction in 2018 run by Councillor Vick Jenkins and others, the first summary point reads "The consensus was that the overall volume of traffic is too high and that this is the main barrier/Catch 22 to walking and cycling being more popular. Measures should be taken to reduce the volume of traffic first and foremost. However, a level of cynicism about the capacity or desire of Bradford Council to reduce traffic or make the situation better for local residents (as opposed to facilitating the flow and throughput of traffic from 'wealthier areas') was palpable in the room."
- i. Drivers naturally want reduced congestion to avoid frustrating waits and accidents, and generally to improve health. That desire may be best addressed by reducing the volume of motor traffic, not by increasing it, and indeed it is Bradford Council's aim to reduce the volume of traffic in the District as a whole.

Evidence is required to match the scheme aims

- j. The table below compares the [Scheme objectives](#) as advertised to the public on WYCA's *Have Your Voice* web pages, compared with those in Council documents.

	Documents about the scheme				
	Oct-12 WYCA adoption in WY+TF	Aug-19 WYCA Report on consultation	Dec-19 WYCA Investment Committee	Dec-19 Appendix OBC summary	Jan-20 BC Exec approval
Scheme Objectives on WYCA 'Have your voice' site					
Improve the A650 Manningham Lane/Keighley Road as a public transport corridor		Yes			
Promote A6037 Canal Road/Valley Road as the main strategic route for traffic		Yes	Yes		
Improve journey times and journey time reliability		Yes			Yes
Relieve existing congestion issues		Yes	Yes	Yes	Yes
Ease difficulties in accessing those strategic connections for people in the north of the district			Yes	Yes	Yes
Provide the infrastructure and an environment to attract more and higher value jobs to Shipley and the rest of Airedale	Yes	Yes		Yes	Yes
Reduce the number and severity of road casualties, particularly child casualties		Yes			Yes
Facilitate delivery of key areas of housing regeneration and development for the Bradford District		Yes		Yes	Yes
Improving the quality of life through the provision of safer walking and cycling facilities and reduced air pollution		Yes	Yes		Yes
Additional objectives, not on the public consultation page					
Increase capacity for A6037		Yes	Yes	Yes	Yes
Support a modal shift from the private car					Yes
Attract more inward investment to Leeds City Region	Yes			Yes	

- k. The original aims in 2012 focused on housing, employment, and access into Bradford and the motorway network "from Airedale and beyond". The strategic aims of economic growth through inward investment and increased capacity for the road system overall, that are revealed in an appendix to the 2019 report, are not emphasised in the recent reports going to Councillors, nor in the public consultation.

- l. The variety of aims in different reports, usually without quantified targets, presents a problem for due diligence in assessing the scheme's value. A [strategy to achieve clearly defined benefits](#) from the scheme, including intended responses if they are not achieved, would be appropriate but has not been made available to date.
- m. No report has been released detailing the traffic and other modelling that has been undertaken to justify the claims for the scheme in the approval of its Outline Business Case (OBC). The targets are not quantified except occasionally as 'improvement' rather than by how much. Some headline figures were presented to WYCA (see above) and to Bradford Council's Executive Committee on 7th January 2020 where the OBC was approved, but there the basis for these figures was not released, and the Council believes the figures are, in any case, based on out-of-date traffic modelling data. Requests for a precise target, for example of air quality, have not been answered yet beyond the general need for the Nitrogen Dioxide levels to be reduced to below legal limits within the Clean Air Zone (CAZ) which is now due to be introduced in 2022 (more on the CAZ below under 'Climate Emergency'). For example, is air quality to be improved in each section of the route, and specifically improved outside each residential and school area, and by which years, or is an overall average improvement the target, or only keeping within legal limits?
- n. The government report on modelling induced demand for traffic, expects 20% of new road capacity to be taken, on average, by traffic that would not have previously used the route ('induced traffic' attracted from other routes, or from other modes of transport). The [report](#) expects more than 20% extra 'induced' traffic in urban currently congested routes. The report was prepared by WSP Ltd, the same company that created and is operating the new traffic model to be used for this scheme by Bradford Council. Induced demand is difficult to model, and sometimes it is minor (as with the Humber Bridge) or very major (as with Hammersmith Bridge). Avoiding induced demand is essential for this scheme. According to the consultation materials, "Our proposal to improve Canal Road / Valley Road will increase capacity so that a lot of the non-local traffic can be taken off Manningham Lane", but if the scheme attracts other traffic it would not achieve its aim of decongestion and only pile extra pressure on other parts of the system that have not been addressed.
- o. Who goes where and why? The composition of the traffic – short- and long-distance, commuting, school runs, shopping, leisure, freight, and especially how much of it is through traffic that could go elsewhere and how much of it is local traffic that could be reduced, is key to providing transport solutions. No information has been made available and perhaps it has not been collected. It is a major task but the existing routing of traffic is needed to be confident about the impact of the road scheme.
- p. Ten to fifteen extra air quality monitoring sites have been established two years ago, including outside Shipley CofE school. They will provide valuable data relevant to the scheme, and on the temporary impact of lockdown. No results will be available until Spring 2021, after the public consultation on the scheme.
- q. [A report of public consultation](#) leading up to the OBC, was published in August 2019. It gave a one-dimensional summary of the responses to each question asked. The key result used in later reports was of 64% support (good or very good) for the scheme, derived from a question that reads in full:

“Our proposal is to improve Canal Road / Valley Road to increase capacity so that a lot of the non-local traffic can be taken off Manningham Lane. As part of this plan we would also like to make significant improvements to road junctions to reduce queuing traffic – what do you think about the proposal?”

Answers (with number of responses in brackets): Very Good 26% (168), Good 38% (247), Neutral 16% (103), Bad 9% (60), Very bad 8% (50), Don't know 4% (24).

In survey design, a question that asks opinions of something framed as desirable ('traffic taken off Manningham Lane, ... significant improvements to road junctions, ... reduce queuing traffic) is known as 'a leading question', likely to get a positive response. This question does not mention dual carriageway, nor increasing capacity beyond that needed to accept traffic from Manningham Lane. It is perhaps instructive that even then fully one third of respondents (33%) responded with neutral, bad, or very bad. A multidimensional analysis would have asked whether those against were car users, lived locally, and so on, as would also have been helpful in the analysis of other questions.

- r. We asked ten questions of the Bradford Councillor and Council Officer in charge of the scheme, on 5th October 2020. Officers have busy workloads already and it is not a surprise that we have not yet had a response (29th October), though more assurance could be given if some of the questions receive a short positive answer:

- “• At what point will there be public consultation about the scheme's shape and principles, informed by evidence on current [and] forecast traffic and its impacts compared to doing minimal changes and other scenarios?
- At what point were councillors consulted with evidence on current and forecast traffic and its impacts? Please can we see that evidence, and any other evidence in the public domain? [We] have unsuccessfully searched in online reports submitted to Council meetings.
- When will the methodology of the Bradford Strategic Transport Model be released publicly, including how future demand induced by larger capacity [is estimated], which is a major concern, and the assumptions made in the scenarios and the handling of uncertainty? The Council has offered to consider a presentation [of the model] during the consultation. However, openness about methods and assumptions is fundamental to evidence-based policy. [We] trust that this can be addressed now, to underpin public confidence in the decision-making.
- In all the above, the impacts on the road system and schools in Shipley and other areas off the direct route of the scheme is a major concern, please take it as read that available evidence on those areas is included.
- Can you provide the OBC with sensitive parts redacted – again to assess the evidence on the impact of the scheme.
- Can you provide the analysis that results in the Benefit-Cost Ratios presented in Table 2 of paragraph 3.5 in the January CBMDC Executive meeting, including the 'Do Minimum' option?
- At what point will Council traffic modellers be able to accept alternative options to judge their impact relative to the proposals?

- An objective is 'improved air quality'. To judge whether the scheme can achieve this, how is it measured: what measures, where and when? Do measures include NO₂ and particulates?
 - Where may we access reports of air quality and traffic volume in previous and recent years along each monitored part of the stretch of Bingley Road from Cottingley to the Branch (intersection of A650 and Otley Road), Saltaire Road, and the roads directly affected by the scheme?
 - The original plan for West Yorkshire Plus Transport Fund (eg 2013 approval in principle by Bradford Council), is subject to satisfactory returns from the Earn Back scheme of business rates. What is the status of that scheme now, and of alternative financial returns?"
- s. Further consultation is required to prepare the Full Business Case, which is the near-final decision point for the scheme. That consultation is due in December 2020 or January 2021, and no further consultation is expected on the principles and shape of the scheme. This cannot be a useful consultation if neither the public nor councillors have in their hands full evidence relevant to the scheme and alternatives to it, and the capacity to engage positively with planners about the impact of the scheme and alterations to it.

Climate Emergency

- t. Climate change has been built in to the UK and the global economy, because they are led by profitable growth which itself depends on short-term exploitation of raw materials and energy. Without a firm transformation there is no hope of limiting the damage, nor of our descendants surviving. This is the nature of an emergency – not doom-laden but realistic and urgent.
- u. Our common human sense of wanting well-being for ourselves, our community and our children, the science internationally and locally in the Bradford Institute for Health Research, and the Council's own air quality and climate emergency policies including its aim to reduce traffic in the District, all point to taking every opportunity to improve the environment and transform priorities toward sustainability and future well-being.
- v. 2020 will be remembered for the lessons learned about the benefits to the environment from lower pollution and less traffic. These lessons have been proclaimed in many forums, by [the Pope](#), [Global Justice](#), the [World Economic Forum](#). [The Labour Party](#) already has a strong Green New Deal policy.
- w. In the context of a climate emergency it is more than reasonable, it is essential, to take a wide social and environmental perspective of road schemes, including this one that was approved in principle eight years ago.
- x. Adjustments that could include Park and Ride, 'last mile' solutions, active travel, incentives and disincentives to reduce car use (including car-share and working at home), diversion of through traffic to routes that avoid bottlenecks, Mass Transit, off-road parking, all deserve urgent attention when discussing the final form of this scheme. Park and Ride at Shipley station is part of the same W Yorks + Transport Fund, with [expanded parking planned for 2024](#), but there is no mention of a ride scheme. It may

attract more traffic to Shipley for commuters to Leeds, rather than aid decongestion on this route.

- y. The route lies entirely within Bradford's [Clean Air Zone \(CAZ\), approved by Bradford Council on 18th Feb 2020](#), which aims to achieve legal levels of air quality as soon as possible. The Council's plan is to penalise the oldest type of lorries, buses and taxis and encourage less-polluting forms of traffic within the Zone. It is not the time to pull back from such initiatives, nor to accept lower targets of air quality. It is the time to ensure a serious reduction of emissions and a much better air quality, as part of [Bradford Council's Breathe Better policies](#), and its commitment to reduce traffic in the District. The CAZ in Bradford is focused on reducing nitrogen dioxide emissions, and does not aim to reduce particulate pollution in any systematic way. Particulate pollution will continue as long as motor vehicles use the roads, regardless of cleaner fuels or electric power.
- z. Current government assessment of traffic schemes favour reducing car journey times over other forms of transport. It would be better to aim high, to use every lever possible to encourage healthier futures through healthier government, including healthy alternatives to car use wherever possible. This is not only a matter of avoiding emissions, but also favouring physical exercise for its positive health outcomes.

What type of campaign is this?

- aa. While the interests challenged by a road scheme are those of local households, the interests in favour of the scheme are fed by national and global interests favouring fossil fuels that will not change easily. In part, a response to the road scheme will be one of education about those larger policies and interests, to clarify where they have a harmful impact on local households.
- bb. What constitutes a win for a response to this scheme, will be the voice of local people's interests, for children's safety and future, for community solidarity and identity, for a healthy response to the climate emergency, and changes to the scheme towards those interests.
- cc. The scheme is already entrenched in WYCA and Bradford Council's plans, which considers that it is in its implementation stage. The interests and views of Council officers, Council Executive, Councillors, Labour Party members, other local organisations and individuals will occasionally differ. An outcome in the interests of residents is more likely with open and clear consultation, and the expression of residents' interests by a coalition of many people and organisations that can sign up to positive common goals.
- dd. Residents can negotiate a good outcome by involving diverse skills of consultation, communication and technical modelling.
- ee. The common interest of all is our own and our children's safe future.

Appendix B. Time line of reports

The documents below start with the decisions yet to be taken at the top, followed by documents and decisions of West Yorkshire Combined Authority (WYCA) and Bradford Council, in reverse date order. The last (oldest) is the 2012 report to Bradford Council accepting the funding of the scheme within the West Yorkshire Plus Transport Fund. Not all the relevant public documents are listed here yet. NOTE: some links may not work unless copied and pasted into the browser.

The WYCA public page for this scheme with background documentation, including the decision process ([assurance framework](#)) is: <https://www.yourvoice.westyorks-ca.gov.uk/bradfordshiplely>

The WYCA Index to its decisions on this scheme is: <https://westyorkshire.moderngov.co.uk/mgIssueHistoryHome.aspx?Id=6311&Opt=0>

Bradford Council's public page for this scheme is: <https://www.bradford.gov.uk/transport-and-travel/major-highways-schemes/bradford-shiplely-route-improvement-scheme/>

Expected timing of future stages

Taken from WYCA Investment Committee Agenda Reports Pack, 4 Dec 2019, pp42-43.

Assurance pathway and approval route		
Assurance pathway	Approval route	Forecast approval date
3 (Outline business case)	Recommendation: Combined Authority's Programme Appraisal Team Decision: Investment Committee	04/12/2019
4 (Full business case)	Recommendation: Combined Authority's Programme Appraisal Team Decision: Combined Authority's Managing Director	31/03/2022
5 (Full business case with finalised costs)	Recommendation: Combined Authority's Programme Appraisal Team Decision: Combined Authority's Managing Director	30/09/2022

Other Key Timescales

4.88 Land acquisition is forecast to complete by December 2021.

4.89 Construction commence is forecast for September 2022 with practical completion forecast for April 2025.

Assurance Tolerances

Assurance tolerances
An increase in Combined Authority costs of over 10% will require further approval from the Investment Committee
That the programme remains within 6 months of timescales set out in this report.

2020 March 24. CBMDC Executive Bradford to Shipley Route Improvement Scheme

Approval of Compulsory Purchase Orders (withheld from public) where necessary, because at least one landowner is not interested in selling.

<https://bradford.moderngov.co.uk/documents/s29353/Exec24MarDocBK.pdf>

2020 February 18th. CBMDC Executive approves Clean Air Zone including entire road scheme route.

The Clean Air Zone will include the entire road scheme route, with commitment to keep within UK legal limits of Nitrogen Dioxide.

<https://bradford.moderngov.co.uk/documents/s28890/Doc BE.pdf>

Bradford Council confirmed in September that it intends the scheme to start in 2022:

<https://www.thetelegraphandargus.co.uk/news/18725201.bradford-clean-air-zone-moving-ahead---despite-yorkshire-councils-pausing-plans/>

2020 Jan 7. CBMDC Executive Item 9. Bradford to Shipley Route Improvement Scheme. Doc AM.

Approval to the principles of the WYCA-approved Outline Business Case. Approval to approach landowners to discuss possible acquisition of land. Greatest detail yet on scheme. Eg 18% reassignment of traffic from A650 to A6037 without new bridge over railway, more with new bridge.

Item 72 of <https://bradford.moderngov.co.uk/ieListDocuments.aspx?Cid=143&Mid=7099&Ver=4>, or <https://bradford.moderngov.co.uk/documents/s28272/Doc%20AM.pdf>

2019 Dec 4. WYCA Investment Committee

“Approval for the Bradford to Shipley Route Improvement scheme to proceed through Decision Point 3 (Outline Business Case) and work commence on Activity 4 (Full Business Case).”

The report to committee is in the ‘Agenda Reports Pack’ [here](#), pp40-44 and pp 95-99. The latter is a summary of the scheme taken from business case, including a one-page summary of the business case.

P40: no confidential or exempt material, ie Councillors have seen nothing more, and therefore not seen the Outline Business Case except in its summary form, without detail of the projections of traffic, air quality, pollution and noise.

2019 August. Phase 1 Consultation Analysis Report. WYCA.

Report of survey and public consultations during 8 weeks 14 December 2018 – 8 February 2019. The key question reads: “Q8. Our proposal is to improve Canal Road / Valley Road to increase capacity so that a lot of the non-local traffic can be taken off Manningham Lane. As part of this plan we would also like to make significant improvements to road junctions to reduce queuing traffic – what do you think about the proposal?” Answers were Very Good 26% (168), Good 38% (247), Neutral 16% (103), Bad 9% (60), Very bad 8% (50), Don’t know 4% (24).

<https://www.yourvoice.westyorks-ca.gov.uk/4335/widgets/13019/documents/5038>

2013 March 12. CBMDC Executive.

Approval of expenditure in principle for WY+TF schemes, and further investigation of each. Bradford-Shipley Corridor listed.

<https://bradford.moderngov.co.uk/Data/143/20130312/Agenda/Decisions%20-%2012%20March%202013.pdf>

2012 Oct 9. CBMDC Executive Committee Report AD 'West Yorkshire Plus Transport Fund

Approve further appraisal of candidate schemes. Listed among the example schemes is "Bradford-Shipley Corridor Improvement. Primary Impact: Access to new Development." Less detail than March 2013 report.

The aims of the £1b WY+TF are primarily economic, to enlarge the accessible workforce. Council leaders have agreed that the fund 'has the potential to

- Establish a fully integrated transport system for West Yorkshire,
- Enhance connectivity to and from West Yorkshire,
- Generate significant additional economic investment that would deliver jobs in the short and longer term; and
- Substantially reduce dependence on central funding, giving local communities and businesses surety over a 10 year programme of Major Transport Schemes."

<https://bradford.moderngov.co.uk/Data/143/20121009/Agenda/Report%20-%20WEST%20YORKSHIRE%20PLUS%20TRANSPORT%20FUND.pdf>

Agreed also by full Council later that month.