

Objections to Outline Planning Permission for Otley Road Fields, Menston by Menston Area Nature Trust.

Application 24/04590/MAO

Menston Area Nature Trust (MANT) is a small environmental charity based in Menston, which works to protect and enhance habitats for nature, in light of the accelerating loss of biodiversity and catastrophic reduction in wildlife in the area and nationwide. We object to the granting of Outline Planning Permission for 75 dwellings on Otley Road Fields, Menston for the following reasons.

The application includes a possible layout of dwellings and other details, but claims that everything might change, which makes objections to it difficult to pin down. This vagueness is, in itself, a cause for concern.

GREENBELT:

The fields proposed for development are the last remaining area of Greenbelt on the north east of Menston, and the last buffer between the built up area of the village and the boundary with Leeds. Building on this site, along with threats of development beyond High Royds, would cause loss of this barrier and risk forming a continuous built environment belt linking Guiseley and Yeadon directly to Otley. The distinct nature of each settlement will be eroded and lost. There is a need for a combined effort between Bradford and Leeds to ensure the two areas remain distinct.

Building on this area of greenbelt would reduce the openness and character of the area and adversely affect any views towards the east. If the protection of the Greenbelt is ignored, there would be effectively no protection against building anywhere, and would set a precedent in favour of untrammelled development going forward, anywhere in Menston or elsewhere. Allowing building on the Greenbelt would not save other areas of the village from development, but rather remove the last protection against widespread development, on the grounds that if they allow development even on the Greenbelt, then no where else is sacrosanct either. Like Putin in Ukraine – no one seriously believes that, once allowed to take part of Ukraine he will be content to stop there – he will just keep pushing to take more.

This Greenbelt also provides much needed habitat for a range of species, and in particular provides a vital wildlife corridor which links the old railway, both going to Burley and Otley, with High Royds and areas south. There is also direct uninterrupted access from this area to the Chevin. Development on this site risks destroying this corridor with resultant damage to all the species that rely on it.

Additionally, Greenbelt is vital for the community. With increasing development, access to the natural world for the population is being eroded and increasingly people feel cut off from nature and alienated from it. There is extensive evidence that spending time in nature is essential for wellbeing, reduces depression and encourages people to take care of the natural environment. It is also now understood that a healthy, thriving natural environment is not just a “nice-to-have” but vital for our existence as a species. Consequently, protecting natural greenspace around where people live, with easy access to it, is essential. Building on this site would yet again push

nature further from a co-existence with the community, particularly in view of the extensive development in Menston in recent years (Derry Hill, Moor lane being the most recent).

TRAFFIC

The traffic was surveyed only for one week, which partially spanned Half Term, so the figures do not reflect the true picture. Also, counts of vehicles don't pick up the regularly stationary traffic along the S end of Otley road where it joins the A65 at the roundabout. The traffic flow figures used in the report date from 2011, so are 14 years out of date, over which time the volume of traffic increased by 8.7% up to 2023 (DoT data). The addition of traffic from 75 new dwellings would significantly worsen an already poor situation. Installing traffic lights at the new junction, only 25m from the roundabout, would cause even more snarl ups, particularly where people are having to queue coming off the roundabout and going down toward Otley. This would cause stationary traffic around the roundabout. Similar traffic lights have been installed where High Royds Drive joins the A65 opposite St Mary's School. This has caused many complaints due to poor traffic flow.

The Transport Assessment mentions that it is 1400m to the local primary school and most village amenities – this distance is such that most families would drive their children to school, and for other events in the village (as they do from Ellar Gardens, across the road), seriously worsening the local traffic situation.

FLOOD RISK

The maps in all the figures have been flipped to give a mirror image, with the area of the proposed development incorrectly marked in fig 4 & 5, which does not inspire confidence in the report, and makes it impossible to assess the validity of its findings.

The report shows no concerns but at the same time suggests the need for a large attenuation pond, which would discharge directly into the beck. There is no indication that this discharge would be treated in any way, and as it stands is a pollution risk to the waterway, and consequently any wildlife dependent on it. Who and how would this be maintained in the long term? In High Royds where Avant was developer, they have refused to maintain the pond going forward, and its future is currently in limbo as no one is prepared to manage it. In this, Avant went back on an agreement to maintain the pond, and is just one example of their lack of reliability. There would be no guarantee that Avant would behave any better on this site.

There is no evidence provided that the current sewage system would cope with the extra foul water of 75 dwellings.

The runoff from the paved area and the housing would result in a considerable increase in surface water from the site. As this outline planning application doesn't go into details, there is no indication of how runoff would be reduced, beyond collecting it in the attenuation pond.

BIODIVERSITY

According to the State of Nature (SON <https://stateofnature.org.uk/>) report published in autumn 2023, one in six species in the UK are threatened with extinction and overall and species have

declined by an average of 19% since 1970. The UK is one of the most nature depleted countries in the world. Consequently, it is vital to maintain habitat and improve it for biodiversity, not just in designated areas, but throughout the country. The National Audit Office <https://www.nao.org.uk/press-releases/risks-to-the-long-term-effectiveness-of-new-biodiversity-net-gain-scheme/> has voiced major concerns about the effectiveness of Biodiversity Net Gain scheme and whether it will be possible to ensure Developers achieve this. In light of the possibility that BNG would not be achieved, and the disastrous loss of quantity of nature, as well as specific species to date, we need to stop nibbling away at existing habitats and instead, enhance them. The potential for this greenfield site to support a wide range of species, if managed sensitively, is far greater as an open, undeveloped, linked area than a built up site, even with some areas of habitat retention.

The Preliminary Ecological Appraisal (PEA) was carried out on 31st October 2024 – on the very last day of the usual window for such assessments and clearly very suboptimal for assessing the current biodiversity on site.

There are no calculations shown for the potential Biodiversity Net Gain of the site, so it is not possible to comment on the developer's intentions.

In 1.5 of the PEA two species of waxcap were found, and further assessment recommended – which means until further assessments have been carried out throughout the spring, summer and autumn, no proper decision can be made based on the importance of the site to existing biodiversity.

The species list provided is stated to be incomplete. Indeed, a botanical survey carried out on behalf of MANT, found a further 62 species not listed here. Consequently it is difficult to claim that the site doesn't include important species.

The PEA species list failed to pick up on the Japanese Knotweed infestation near the southwest border, close to the powerlines. There needs to be a major plan in place to remove this infestation and prevent it infesting neighbouring properties. This would also effect the layout as no dwelling can be built within the vicinity until it is completely eradicated.

A full Ecological Impact Assessment should be carried out before any decisions can be made, with a fully explained Environmental Management Plan to deal with any invasive species on the site, and to ensure protection for vulnerable wildlife, and that true improvement of habitats would be achieved.

Full surveys for crayfish, water vole and otters need to be done on the actual site, to confirm either their presence or the existence of suitable habitat.

As stated elsewhere, the “piped discharge route into Gill Beck” has no mention of filtration or pollution control, which could have major consequences for local flora and fauna, both in the waterways and elsewhere on the site.

Again, the landscaping is one of the “matters not for consideration on this application”, but it is an essential factor in determining the impact of the site. The PEA states (4.14) that existing trees will be retained, and most of the hedgerow along Otley Road, *except where they will need to remove it for access* – what power would prevent them removing a large stretch of hedge and trees, claiming access requires it? There is also an old hedge running through the middle of the site, next to the public footpath, and another at right angles to the footpath, near the existing building. These are vital habitats for wildlife, and should also be retained and enhanced, with

additional wildlife corridors provided throughout the site. Currently only one or 2 trees are shown as kept. They state there are no Tree Preservation Orders on any trees – this is because Bradford Council would not designate trees that were not already within urban areas. As this is Greenbelt, it was assumed unnecessary. However, there are several mature trees, including at least 4 substantial Oak trees, that must be protected.

Bats are known to be in the area, and use these fields and riparian areas to feed, and possibly breed. Much more work is needed to ensure they are encouraged to stay, rather than lose more habitat.

Developing this site would inevitably cause lighting to be installed. It is clear that even low level, downward pointing lights, have an adverse effect on all sorts of wildlife, from bats and moths to hedgehogs, particularly in an area previously unlit. This development would result in further damage to the wildlife.

Paragraph 4.6 of the PEA states that “Consultation with MAGIC site check confirms that the application Site lies within the 2-3km Impact Risk Zone (IRZ) for South Pennine Moors SSSI. Proposals for any net increase in residential units will have a likely significant effect on the qualifying features of the SSSI through increased recreational pressure.” This is a serious problem, as we know that biodiversity and the quantity of wildlife is declining at alarming rates, and every effort should be made to reverse this trend. Providing further dwellings near a particularly sensitive area would damage the SSSI, not help reverse the impact of humans on wildlife.

HOUSE BUILDING QUOTA

Menston has already had over 200 new houses built since 2020, which is a high percentage increase of 10%, causing a strain on local infrastructure. The village cannot absorb many more dwellings without changing its character and becoming indistinct urban sprawl.

ENERGY EFFICIENCY

While details of the dwellings are outside the scope of this proposal, the report claims the buildings would be designed to be 5% more efficient than current building regs require. This is not very impressive. Every new build should meet such high environmental standards that they are safe from requiring retrofitting in a few years' time. Any new dwellings built anywhere should meet a net zero CO₂ energy standard, negating the need for any extensive central heating.

Gas– There should be no requirement for gas on the site. If any central heating is required, it must NOT be met by installing gas boilers. Air Source Heat Pumps use less than a third of the energy of a condensing gas boiler, and electricity is increasingly becoming “greener”. Equally, induction hobs are more efficient than gas hobs, and cause far fewer CO₂ emissions as well as reducing the particulate pollution in the home, which is now understood to carry a high health risk.

Solar PV – The report states that Solar PV will be installed “where appropriate”, which, without details, is difficult to assess. In any case, this does not go far enough – every roof except those facing north, should have solar panels. While east or west facing panels do not maximize the midday sun, they gain in the earlier and later parts of the day and make a significant contribution to reducing the energy use of the dwelling, and to the national grid. Every dwelling should also have battery storage and electric car charging as standard, to enable full use of the energy from the solar panels and additional storage capacity for the national grid.

Number & Layout of Dwellings

While this application is for outline planning permission, so sidesteps the exact number and layout of the dwellings, this is a vital consideration and needs addressing. 75 properties would have a substantial impact on the locality, from traffic to biodiversity, as shown elsewhere in this document. There is no breakdown of the number of 2 bed dwellings, which are in short supply locally. They say that 50% or more would be “affordable” without indicating what this would entail and given the price of properties locally, these are unlikely to be cheap enough to help the need. How much Social Housing would be included, and who would manage such housing.

The layout of the scheme, again apparently subject to so much change that commenting on it is almost useless, does have a major impact on the viability of the site, and on the existing neighbours, who would be overlooked at present. Also there is a high voltage electricity line running across the site from east to west, which is not shown on the plans and would be too close to some of the dwellings, running across their gardens.

AVANT:

Avant are the developer who have been responsible for developing the High Royds site, next to Menston. It is clear that they have reneged on several S106 agreements regarding that site, and there is no evidence that they would treat any other site any better. Bradford Council should be very careful before engaging with this developer.