## The Bronte Society – Consultee Response to Calderdale Council

## Comment Date: Wed 18 Oct 2023

Thank you for consulting The Brontë Society about the proposed wind farm development at Walshaw Moor Estate.

While the trustees have not been able to meet during this consultation period, the scoping report and associated documents have been shared and discussed over email and I am now writing on behalf of the Brontë Society Board to convey our thoughts.

The Brontë Society has concerns about both the scale and the location of the proposed wind farm. The location is environmentally sensitive - SSSI, SAC, SPA - and we would be interested to know the views of fellow consultees, particularly Historic England, Natural England, Moors for the Future and the Royal Society for the Protection of Birds. In addition, while the Brontë Society has a commitment to sustainability and renewable energy, we believe the proposed development would have a significant and detrimental impact on an iconic local viewpoint and world-renowned landscape. To this day, people walk the moorland between Haworth and the Walshaw Estate for reflection, inspiration and to understand the context and surroundings in which the Brontës wrote their poetry and world-famous novels. We believe we have a duty to ensure that the moorland associated with the Brontës evolves sensitively and meaningfully and feel that the scoping report does not adequately address the visual impact that 65 turbines would have on the moorland around Top Withens and the area's many public footpaths.

We have also addressed the following questions listed in the scoping report:

Q12: Do you agree with the proposed viewpoint locations? No, please see response to Q13 below.

Q13: Do you have any specific expectations in relation to the approach that should be taken the preparation of visualisations for the Proposed Development? Top Withens is an iconic landmark and the Brontë Society would expect viewpoint locations and visualisations to include the views of, and towards, the ruin, particularly as approached from Haworth. We would also expect future iterations of plans to include the view towards the proposed development from Parson's Field (ie behind the Brontë Parsonage Museum) and Penistone Hill. These are both significant sites where residents and Brontë Parsonage Museum visitors head for a view of the moorland that both inspired the Brontës and is so intrinsically linked to their work. We acknowledge that visuals 7.5a and 7.5b show the view from Top Withens, but they do not provide an impression of the visual impact that siting turbines so close to the ruin will have.

Q 27: The intangible heritage associated with the Bronte landscape will be a key consideration for this assessment, are there any key locations or walks in the area

which need to be included within the assessment?

The Brontë Parsonage Museum is a Grade I listed building, but Appendices 1 and 2 only refer to Grade II listed buildings, some of which are located in close proximity to the Parsonage. We do not understand why Grade I listed buildings, including the Parsonage, have not been included in this section of your proposal.

Other key locations are Ponden Hall, the Brontë Waterfall, Wycoller and the ruin of Top Withens. Walks in the area include the Pennine Way, the Brontë Way, the Brontë Stones Walks and the walk from Haworth to Top Withens, which is popular with both ramblers and Brontë enthusiasts. These should all be included in the assessment.

Q 28: Are the proposed Study Areas sufficient to determine likely significant effects on designated heritage assets?

While we recognise that the Yorkshire and the Humber study area would include the Bradford local authority area, we believe the proposal should also include a focus on the tourism economy for Bradford. While the boundary of the proposal may fall within Calderdale, the key Brontë sites and attractions which bring people to the area are situated in the Bradford district.

Q 29: It is proposed to support the assessment with a detailed walkover survey across areas likely to be subject to direct impacts only, i.e. turbine footprints, access roads, supporting infrastructure. No additional survey will be undertaken across sections of the Site which will remain physically undisturbed. Do the consultees agree with this approach?

The Brontë Society trustees feel that the detailed walkover survey needs to include all sections of the site, not just the areas "likely" to be subject to direct impacts. We have concerns that the visual and environmental impacts will reach beyond the areas that are currently considered likely to be directly affected and, especially as plans may change and develop over time, believe that a wider walkover survey needs to be undertaken.

Q30: Are there additional datasets/archives the Consultees would direct us to inform the assessment?

We are not able to suggest any datasets ourselves, but would expect you to seek out, share and consider any data from other sites of a similar scale and in a similar location.

Q31: Are there other organisations the Consultees wish us to consult (who may have knowledge useful to inform the assessment)?

We think that the list of consultees is quite comprehensive.

The Brontë Society trusts that this sets out our current concerns and expectations, but please don't hesitate to contact me if you require any further information.

Yours faithfully

Rebecca Yorke

Director, The Brontë Society and Brontë Parsonage Museum On behalf of the Brontë Society Board of Trustees