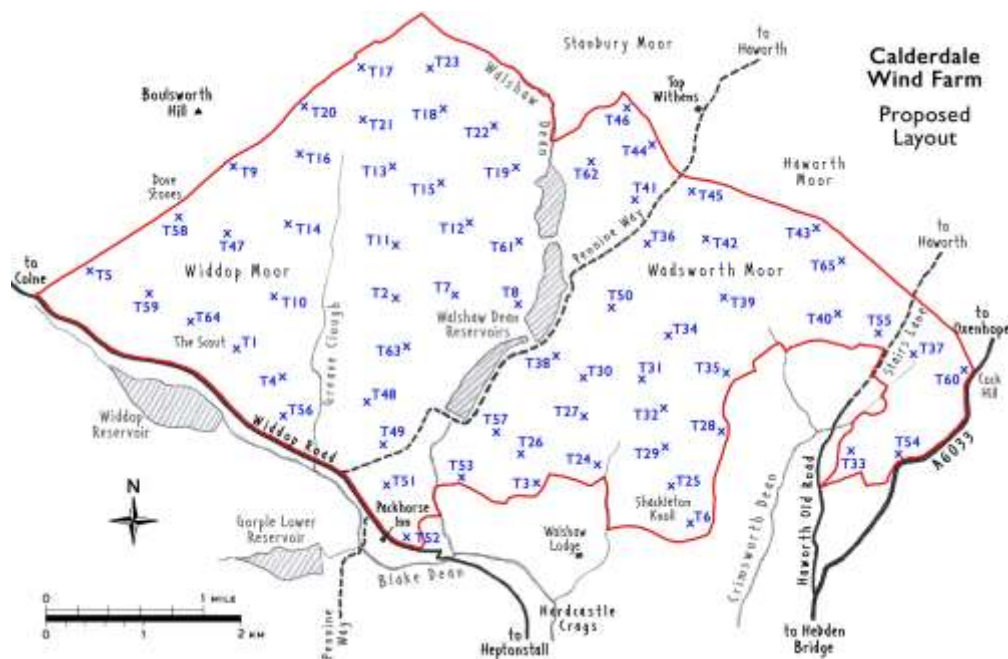


Key Environmental Objections to Calderdale Wind Farm

There is a lot talk about the purported environmental benefits of the so-called 'Calderdale Wind Farm' as it has been presented by the developers as a green energy scheme and latched onto as a miracle cure for solving the problem of climate change and reaching net zero. However, the proposed site on Walshaw Moor is completely inappropriate for a development of this kind as it is an integral part of the South Pennine Moors Site of Special Scientific Interest (SSSI) of international significance for its moorland habitats and wildlife. Far from being environmentally beneficial, this development would be an ecological disaster for Calderdale and presents an existential threat to the countryside and wildlife of the Upper Calder Valley.

Many people are unaware of the precise location and extent of Walshaw Moor or its environmental significance. For the record, the Walshaw Moor Estate is a large area of ecologically rich moorland covering more than 9 square miles, owned by Lancashire businessman Richard Bannister. In addition to the moorland around Walshaw Dean with its three reservoirs extending towards Top Withens, Stanbury Moor and Haworth Moor (familiar to many as the route of the Pennine Way), the Walshaw Moor Estate includes a large part of Wadsworth Moor and Shackleton Moor, located directly above, around and between the two adjoining valleys of Hardcastle Crags (Hebden Dale) and Crimsworth Dean. The Walshaw Moor Estate also includes the vast expanse of Widdop Moor above Widdop Reservoir extending from Great Edge and the rocky outcrop known as The Scout to Dove Stones near Boulsworth Hill in Lancashire. The 65 turbines proposed for the Calderdale Wind Farm would be scattered throughout the Walshaw Moor Estate, directly impacting the 2,352 hectares of SSSI moorland on the site itself and affecting all the neighbouring and surrounding areas in Calderdale, Lancashire and Bradford. Although described as a 'wind farm', this is a massive industrial development and there is nothing remotely agricultural about it. This is a huge power station and the only comparable developments in England are far out at sea.



The South Pennine Moors Site of Special Scientific Interest (SSSI) is of national and importance for its wild moorland habitat and rare flora and fauna, including critically endangered species such as merlin and golden plover. Described by the Upper Calderdale Wildlife Network (a long-established group of local naturalists and conservationists) as ‘the Jewel in the Crown’ of Calderdale’s wildlife sites, Walshaw Moor was designated as an SSSI by Natural England because of the significance of its diverse upland plant communities, with extensive areas of blanket bog on the upland plateaux punctuated by species-rich acidic flushes and mires, wet and dry heaths, heather moorland and acid grasslands. As well as playing a crucial role in protecting the environment by sequestering carbon and storing water in the blanket peat bogs, these sensitive moorland habitats provide vital breeding and feeding sites for ground-nesting birds, including curlews, lapwings, golden plovers, oystercatchers, redshank, snipe and skylark, which return to this specific location between around February and July each year to mate, lay their eggs and rear their chicks. SSSI sites are deemed to be of very high conservation status and are governed by legally-binding regulations to protect them from activities that would damage these habitats, which it is the responsibility of Natural England to enforce.



Bog cotton on Walshaw Moor



Dove Stones on Widdop Moor

Walshaw Moor’s environmental and ecological significance is further reinforced by the fact that it has been designated at a European level as a Special Area of Conservation (SAC) and a Special Protection Area (SPA), classified under Conservation of Habitats and Species Regulations 2017. This may sound rather technical but in environmental terms it is absolutely crucial, because what the landowner and the developers are proposing is to destroy the ecosystem of one of the most important and valuable habitats and wildlife sites in Europe. The Special Area of Conservation (SAC) classification recognises the significance of Walshaw Moor’s moorland habitats. Its Special Protection Area (SPA) status relates specifically to the conservation and protection of wild birds, in particular the estate’s substantial population of ground-nesting birds. SACs and SPAs are administered by the Joint Nature Conservation Committee (JNCC), which advises the UK Government on nature conservation, and which was constituted by the Natural Environment and Rural Communities Act 2006. As in the case of SSSIs, SAC and SPA regulations impose strict restrictions on what activities are permitted on these high conservation status sites. As well as being regulated by Natural England, SAC and SPA regulations carry even greater weight as they are legally binding at a European level.

In its guidance to the developer on the Calderdale Wind Farm proposal on Walshaw Moor, Calderdale Council has been advised that ‘Natural England considers that any

credible risk of a measurable loss of terrestrial habitat, no matter how small, from within a European Site is a “likely significant effect” and the full significance of its impact on site integrity should be screened-in and further tested by an Appropriate Assessment. Natural England will normally advise that a lasting and irreparable loss of European Site habitat will prevent a conclusion of no adverse effect on site integrity being reached unless an Appropriate Assessment can clearly ascertain otherwise.’ Regarding Walshaw Moor’s designation as a Special Protection Area, Natural England has advised that the following impacts during the construction, operation and decommissioning of the proposed Calderdale Wind Farm would be in breach of Habitats Regulations: ‘Direct loss and deterioration of SPA bird supporting habitat; Indirect habitat loss due to disturbance and/displacement (including disruption to flight lines resulting from avoidance action); Mortality resulting from collisions with turbines or ancillary infrastructure’. In other words, the developers have to prove that the proposed Calderdale Wind Farm will not damage the protected habitats and protected species on Walshaw Moor during the scheme’s construction and throughout its estimated 25-30 year lifespan.



Golden plover on Walshaw Moor



Curlew on Walshaw Moor

This is clearly impossible as the massive scale of the excavation, construction and engineering work entailed in installing, operating and decommissioning the 65 huge 200-metre high turbines would seriously damage the SSSI moorland habitats on Walshaw Moor. In addition to the extensive foundations and crane pads required for each individual turbine, the development would necessitate an extensive network of newly-constructed access tracks measuring at least 6 metres wide criss-crossing the entire site, and a vast network of cable runs up to 40 metres wide to connect the turbines to the National Grid. It is self evident that the installation and running of the proposed Calderdale Wind Farm would cause widespread and irrevocable ecological damage to the wild moorland habitat and the flora and fauna throughout the Walshaw Moor Estate. As well as being environmentally disastrous, the proposed development is technically illegal as it contravenes SSSI, SAC and SPA regulations on multiple fronts.

As well as turning the entire Walshaw Moor Estate into an industrial wasteland, the wind farm would have disastrous knock-on effects on the habitats and ecosystems on nearby land, not just the moorland uplands but the hillside meadows, woodlands and steep river valleys to which the uplands are ecologically linked. Key neighbouring sites include the National Trust estate of Hardcastle Crag and the adjoining valley of Crimsworth Dean, also partly owned by the National Trust, both of which are of national importance for their rich and varied habitats and for their rare flora and fauna. The Walshaw Moor Estate curves round Blake Dean at the head of Hardcastle

Crags and encircles Crimsworth Dean on both sides of the Haworth Old Road (the popular Hebden Bridge to Haworth footpath route). If the wind farm goes ahead, these two dales would be hemmed in by turbines at either end, and literally in their shadow along their length.



Scale diagram of 200 metre turbine in Blake Dean in Hardcastle Crags

The proposed Calderdale Wind Farm would not only destroy plants, wildlife and entire ecosystems on Walshaw Moor itself, it would have disastrous knock-on environmental and ecological consequences for the surrounding uplands and valleys, which are all interconnected. The destruction of ground-nesting bird habitats on Walshaw Moor would have dire consequences for colonies of the same species which feed and breed on neighbouring land, including Hardcastle Crags and Crimsworth Dean. Birds do not respect property boundaries so the creation of a hostile environment on Walshaw Moor resulting in the destruction of their habitats would lead to their elimination in nearby areas as well. Needless to say, reducing the permeability of the moor by destroying the peat and surfacing large areas with concrete and crushed stone would inevitably heighten the risk of flooding in Hebden Water, Crimsworth Dean Beck and the River Calder. So the proposed Calderdale Wind Farm will not only reap destruction on precious habitats and wildlife on Walshaw Moor specifically and the Upper Calder Valley in general, it could potentially reap destruction on Hebden Bridge, Mytholmroyd, Luddenfoot, Sowerby Bridge and all the communities downstream of Walshaw Moor, as it is the main catchment area for the Calder Valley.

The Yorkshire Wildlife Trust, in their response to the Calderdale Wind Farm proposal, have stated that they 'object to the principle of this development'. They have also pointed out that 'damaging the peatland in order to install the turbines and their associated infrastructure would likely negate any possible benefit from the wind turbines in terms of green energy generation, through the release of carbon into the atmosphere which has been locked away for hundreds to thousands of years. Once

peat dries out and becomes inactive it becomes incapable of storing carbon in the future.’

The RSPB are also opposed to the development and have stated in their response to the developer’s Scoping Report that ‘The proposal to develop a wind farm on Walshaw Moor is highly inappropriate, given the sensitivity of this location, with important peatland habitat, significant wildlife interest and protected wildlife sites.’ They have also pointed out that there is no imperative for a wind farm to be constructed on this particular site: ‘Given this is not the only location that a wind farm could be located in England or indeed in the UK, we consider that less damaging alternative sites for wind farm development will be available.’

Given the extent of the legally-binding SSSI, SAC and SPA regulations protecting Walshaw Moor, and the existential threat that this huge wind farm presents to environment, ecology and communities of the Upper Calder Valley, the proposed Calderdale Wind Farm is patently inappropriate and should be automatically ruled out on these grounds alone by both Natural England and Calderdale Council.

All the above quotations are from consultee responses to the Scoping Report for the proposed Calderdale Wind Farm on Calderdale Council’s Planning Portal.