



**National
Trust**

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17 October 2023

Calderdale Council,
Town Hall,
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For the attention of Richard Riggs

**RE: 23/06010/EIA | Scoping opinion | Walshaw Moor Estate Widdop Road Heptonstall
Hebden Bridge Calderdale**

Thank you for notifying the National Trust of this submission for a scoping opinion for this significant proposal and we welcome the opportunity to provide our observations at this stage. The proposed development lies in close proximity to property we look after at Hardcastle Crags and has potential to be visible from other properties we care for across Yorkshire and the Northern Peak District.

Background

The Trust comments on planning applications where it is judged that proposals would affect the special significances of the sites the Trust cares for on behalf of the nation or they would have a significant impact on the area surrounding them.

One of the founding beliefs of the National Trust is that places matter to people. Our statutory core purpose is to promote and protect places of historic interest and natural beauty – for everyone for ever. Over the last 125 years we have continually sought to ensure that the nation's countryside, heritage and natural environment are protected for the enjoyment of all and for inheritance by future generations.

Climate change presents a global risk and is the single biggest threat to National Trust land and properties. To limit the effects of climate change, rapid reductions in global greenhouse gas emissions are needed. There needs to be an increased reliance on renewable energy to achieve these targets. However, it will be key to strike the balance between energy generation and the need to protect the historic and natural environments.

We recognise the necessity of transitioning to renewable energy and that this may have impacts that need to be carefully considered. The Trust is supportive of renewable energy as a matter of principle

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and believes that appropriate development can and should play an important role in its supply.

This proposal is on a significant scale and the scoping report provides limited information, asking questions around what assessments should be considered or scoped out; when the evidence base is limited and is insufficient for NT to take an informed view on the proposal at this stage. For this reason we wish to reserve our position until further details are made available. The rest of this letter sets out our initial concerns that we would expect to see assessed within the EIA. For the avoidance of doubt the absence of a response on a particular topic in this letter does not signal our satisfaction with the approach adopted.

Overview of National Trust properties potentially impacted

Hardcastle Crag comprises 166 hectares with Gibson Mill at its heart. The mill and its cottages are Grade II listed (list entries 1226169 and 1266004). Its historic value lies in being a first generation cotton mill still associated to its complex of ancillary buildings. It tells the story of the rapid development of the textile industry in the early 19th century together with the development of the site as an early 20th century tourist destination. Today it is a major feature and popular tourist attraction within the West Yorkshire Pennines attracting approximately 120,000 visitors a year who use the car parks to access the site, in addition to thousands who use and value the site as their special place to access the beauty of this green space for leisure recreation and peacefulness

The mill with associated mill ponds occupy an important position adjacent to the river lying in the wooded valley of Hebden Dale it contributes to the aesthetic value of the woodland. At the junction of several rights of way, it forms a popular feature of walks from Hebden Bridge, Heptonstall and as far away as Haworth.

The central part of the estate comprises two steep-sided wooded valleys, each with a stream running through and fed by numerous springs. The head waters are on the moorland and feed the Widdop and Walshaw reservoirs. The woodland (117 ha) is predominantly broadleaved with small areas of conifers. Rock outcrops (the "Craggs") and millponds are additional features. The woodlands are of regional importance supporting a good range of plants, invertebrates, birds and mammals. The ground flora is typical of acid woodland with the richest areas associated with the streams and flushes. The woods are of particular interest for the bryophyte and lichen floras that thrive because of the high humidity in the deep valleys. The fungi are also of specific interest. It is a designated Local Wildlife Site (policy GN3).

For NT therefore, potential impacts on hydrology, and on the natural and historic environment are amongst our key concerns.

The application site lies to the north-east and east of the property; with the nearest proposed turbine approx. 420m from the NT property boundary. An ownership plan is attached with this letter.

Within our ownership there are holiday cottages at Hardcastle Lodge and Widdop Gate Barn and we have residential tenants at Widdop Gate Cottage, Old High Laithe and New High Laithe, as well as internationally important grassland managed in-hand and on licence. We would expect visual impacts, noise and disturbance for tourism/recreational users, residents and farming to be scoped

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into the EIA and we would like to to agree key receptors and specific view points for assessment.

Further afield we look after land at Malham Cove, Marsden Moor and Northern Peak District. Again we would wish to agree visual receptors for inclusion in the LVIA.

Specific concerns/ issues to assess

We would expect the applicant to provide a suitable assessment of the following areas;

Design & Construction

There is no indication that the selection of the site has evolved through the scoping process. Evidence that the site has been selected, based on initial scoping, would be useful to know. Whilst noting the design is evolving we find it strange that the applicant indicates an area has been identified for the PV array (but does not set out where), and the fundamental issue of site access has not yet been determined, nor have areas required for battery storage, access tracks etc been identified. For a proposal that is so significant, the absence of any indicative layout and design information at this scoping stage is a concern.

At a general level we have concerns regarding the location of turbines in close proximity to walking routes that cross the moors, as this area is highly popular for recreation and for tourism in West Yorkshire; micro siting to remove nearest turbines closest to such areas is recommended.

Noting the intention to produce a Construction Environmental Management Plan, we would expect to see sufficient detail within the submission itself to provide certainty to communities around how the impacts of construction could be managed. The intention to submit a draft document with the application is therefore supported. NT would welcome engagement in this process and trust that other stakeholders and adjoining landowners will be included such as RSPB, Yorkshire Water.

There needs to be commitment to site decommissioning and a site restoration plan as it must be clear what will be decommissioned and removed from the site at the end of the operation. The impacts may need to be assessed within the EIA as the National Policy Statement confirms there may be some instances where it would be more harmful to the ecology of the site to remove elements of the development, such as the access tracks or underground cabling, than to retain them.

Access issues in relation to NT property is set out below.

Policy

The EIA needs to refer to relevant policies/statements; rather than reference those that have been superseded e.g. The Yorkshire and Humber Regional Spatial Strategy (revoked in 2013 (with the exception of the policies for green belt around York), Planning Policy Statements superseded by the NPPF/Planning Practice Guidance and National Policy statements and UDP policies which have been superseded by the Calderdale Local Plan adopted in 2023.

As the Local Plan is newly adopted this means it has recently been subject to Examination and the scope for renewable energy across the District has been considered as part of this process. Studies informing the evidence base to the Plan (South Pennines Wind Energy Landscape Study Julie Martin

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Associates 2014 etc) provides information at a strategic level on the relative levels of landscape sensitivity to wind turbine development across the study area. Key strategic priorities in relation to Calderdale that the Plan identifies are to :

- *Prevent any significant harm to the landscapes of the South Pennines Heritage area which is highly valued at a regional level for its many special landscape qualities, including wildness and tranquillity, and its important recreational role;*
- *Conserve significant areas of open, less modified moorland and moorland fringe landscape, especially in the parts of the South Pennine Moors that lie north and south of the scenic Calder Valley and are presently untouched by wind energy development;*

As a result the Plan makes clear the Council chose not to identify suitable locations for Turbines other than in areas where there is either low or moderate landscape sensitivity. The application site is not identified as a suitable location for such development and is designated a Special Landscape Area (policy GN4). It is not clear at this stage how the landscape sensitivity of this area could be reconciled with this significant proposal. On a wider point an assessment is also required for the impacts on the green belt which forms around half of the site.

Ornithology

We note that the report does not propose to scope out any ornithological aspects from the assessment. As the SPA/SAC/SSSI designations and the initial survey work confirms the area supports a wide and diverse list of species and it will be essential to ensure robust data supports the EIA. We will defer to the expertise of Natural England and the RSPB to identify any particular issues in the assessment process outlined in the report. We expect a Habitats Regulations Assessment would be undertaken due to the international importance of the site for birds.

The report states that the annual red grouse shoot on site is 'expected' to be halted as a result of the Proposed Development, which will result in the removal of disturbance and displacement impacts from these activities, thereby benefitting some species that may otherwise be displaced by these. It is not explicit which would benefit. If this is the applicant's intention then a legal commitment should be provided with the application to ceasing this shoot, in order that any benefits from ceasing the activity can be suitably delivered and then subsequently monitored.

Landscape and visual impacts

There appears to be a reluctance to fully assess visual impacts associated with the solar PV array and the structural components of the development such as the battery storage area. localised visual impacts will be important to assess; for example siting (avoiding glare) and minimising the built components away from sensitive receptors.

There is a lack of information on the land management during the operational phase – will it be grazed for example; lack of information on security fencing necessary around the solar development and how these may impact on public access. Without the above information, it is difficult to identify likely significant effects and possible mitigation.

It is difficult to confirm that the viewpoint locations shown in figures 7.3 and 7.4 are sufficiently comprehensive without further information. It would be helpful if further information could be provided

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that shows the zones of theoretical visibility of the site overlaid with information of: open access areas; promoted and non promoted public rights of way, public car parks, public highways, other stopping places and an analysis of the topography through the use of varying tonal rendering, that distinguishes the higher and lower elevations of the landscape. In this way the public accessible locations of various kinds, at high elevations where views are available, will be more easily distinguishable. There would be an expectation for viewpoints to capture the change experienced from all aspects and from within the site, the latter of which seems non-existent.

NT would like the applicant to engage with us on the selection of views and viewer types for the 'recreational routes, main visitor locations' particularly in relation to Hardcastle Crags; but the other NT properties identified within the 40km radius (Figure 7.2). For example, the site is not visible from the NT car park at Hardcastle Crags but is visible outside of the boundaries of the property which are popular walking routes, where impacts on recreational users requires assessment. For the residential visual amenity assessment NT properties at Widdop Gate which lie within the 2km threshold to the nearest turbines (T3 52 53 26) should be included.

The scoping report states that existing trees or shrubs required to be removed or relocated would be replaced by an equal or greater number. The difficulty of new tree planting on peat moorland is well documented and we have significant reservations about the prospects of this suggestion. There will also be a need to fully comply with Biodiversity Net Gain requirements.

We agree it is important to assess the visual effects of development on recreational visitors to attractions and visitors to outdoor pursuits within the Study Area. We also agree, LCTs outside the ZTV do not need to be assessed and townscape character assessment work is not necessary for urban parts of the Study Area. The measures outline in 7.8 are likely to form part of the mitigation measure, however at this stage it is not possible to say whether they will be the only measures necessary.

Cultural Heritage

The Grade II complex at Hardcastle Crags lies within within 2km of the turbines T3/T6 and within 2.75km of others nominally T52,53 24. NT would therefore expect therefore a proportionate assessment of impacts on significance arising from development within its setting to be undertaken. Whilst there are not likely to be direct visual impacts arising to the mill (given its position within the valley) nevertheless as NPPF makes clear setting includes the surroundings in which a heritage asset is experienced and this is a particularly tranquil area; we would therefore expect the assessment to scope in both noise, disturbance arising from construction impacts and also for its operational phase (noise) for the heritage assets affected.

For the avoidance of doubt we consider the Hardcastle Crags complex to fall within the category of High as a Grade II listed building 'which can be shown to have exceptional qualities in their fabric or historical association' (table 11.5)

Biodiversity and habitats /ecology

Due to the ecological sensitivity of this area it is apparent that there are likely to be significant impacts on habitats or important species that cannot be avoided through micro siting turbines or including buffer zones. In the absence of detailed design, we do not understand how the claim that

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the development presents an opportunity to enhance the biodiversity value of the site through the creation of enhanced habitats for a range of species can be supported; particularly, when the removal of irreplaceable habitats (blanket bog) appears likely. This loss is a significant concern for NT and it is not clear at this stage whether any mechanism can be appropriately used to mitigate for its loss. Nor how Biodiversity Net Gain requirements due in January 2024 would be able to effectively mitigate for such a significant proposal.

There needs to be an assessment of principles relating to the Habitats and Species Regulations applicable to the Project and is likely to require an HRA screening as a first step in assessing impacts on the habitats and species present on site. For consistency the ecology chapter should acknowledge the SPA although accepting this is covered in the ornithology section.

Geology, Peat and Hydrology

We agree that a qualitative flood risk assessment for the proposed development and hydrologically connected areas downstream should be scoped into the EIA, particularly given the significance of water/ streams to the Hardcastle Craggs property. We recommend that water quality and flow are monitored now in order to provide a baseline for assessment and future management thereof. Any potential for impacts to arise such as the management of pollution risks to species and habitats will be a key element of this to avoid impacts within the site itself and beyond its boundaries.

It is clear from the initial peat survey plan that significant areas of the development site comprise deep peat that are likely to be impacted by the turbines themselves but also from the associated development, including concrete pads/ routing of access tracks, battery storage site etc. This is a significant concern for NT and it is essential that the impacts on peat are fully considered in the EIA using the Peat Landslide Hazard and Risk Assessment with the provision of a peat management plan.

Access traffic and construction

We find it surprising that the applicant provides no indication of where site access(es) may be for a development of this scale, or at least alternatives under consideration. This is a concern given the narrow nature of some of the roads in the vicinity particularly to the south and east where potentially significant impacts on local communities could arise during the construction process.

Within the Hardcastle Craggs property it is important to note existing single width steep crushed stone estate roads run through the property (which the Trust has the responsibility to maintain), which are the only access routes for some tenant farmers up onto the moors. NT would not accept any access arrangements for construction and/or operation and maintenance of the windfarm using these constrained routes.

We have concerns at this stage around the number of access tracks that will be required for construction and potential for risks to pedestrians in this highly popular walking area. We are pleased to note impact on pedestrian amenity is included in the assessment, which must include recreational users of the public footpath network.

Socio-economic tourism and recreation

We welcome that the role of the tourism sector in Calderdale's economy, with consideration of

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attractions and recreation assets such as trails, in the immediate vicinity of the proposed development and the impacts on tourism is scoped into the EIA. There is no information provided on timeline for construction and there is likely to be a significant period when recreational users may be deterred from visiting the area. We would want to understand what mitigation could be provided in these circumstances. Temporary impacts both during construction and in the operation phase need to be scoped into the EIA.

The Calderdale Local Plan designates Hardcastle Crag as a protected open space and recreation facility in the district (policy GN6) and any indirect impacts that might occur to safeguarding the future of this area (arising for the environment or historic environment) would need to be scoped into the EIA.

National Trust wishes to be consulted and notified of any further submissions and would request via this letter that the applicant approach us for direct engagement at a suitable opportunity.

Yours sincerely

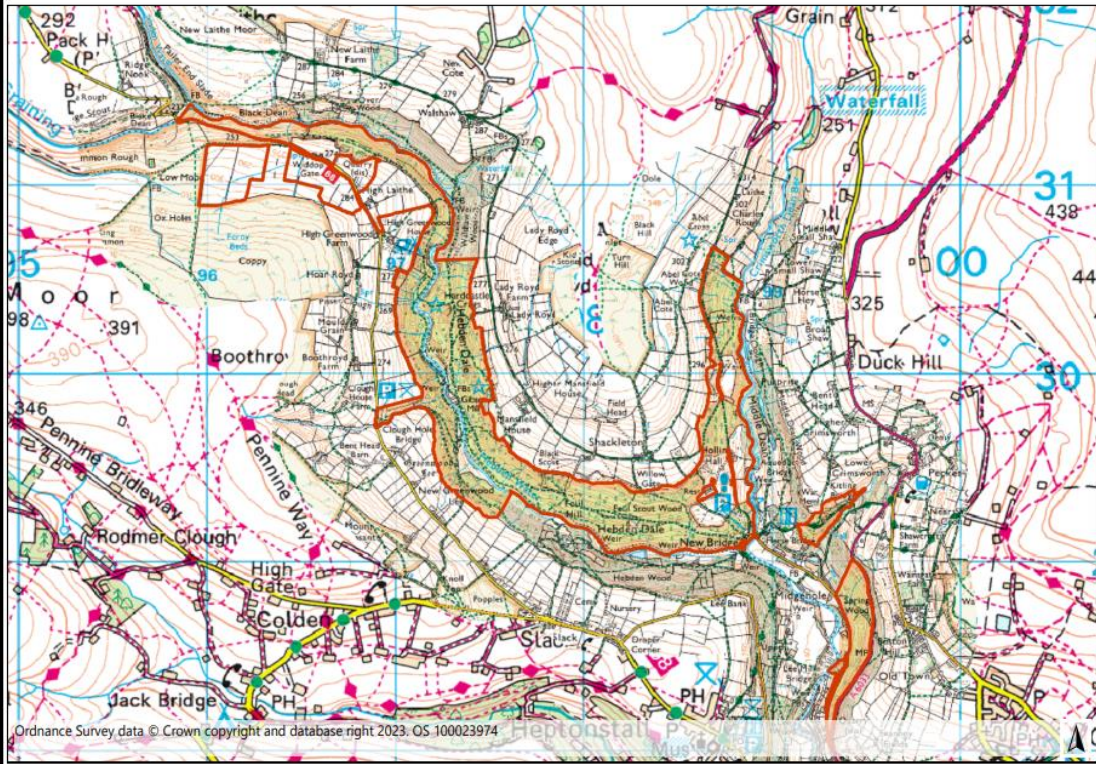
A handwritten signature in black ink, appearing to read 'Natasha Rowland', written in a cursive style.

Natasha Rowland MRTPI
Planning Adviser (North)

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National Trust Hardcastle Craggs



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Scale 1: 25000 (when printed at 100% on A4 landscape)

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- Legend**
- NT Land Interest
 - NT Ownership
 - NT Leasehold

Notes