## The Environmental Significance of Walshaw Moor as a Site of Special Scientific Interest, a Special Area of Conservation and a Special Protection Area

The Walshaw Moor Estate is an integral part of the South Pennine Moors Site of Special Scientific Interest (SSSI), an area of unenclosed moorland of national importance for its wild habitat and rare flora and fauna, including critically endangered species. Walshaw Moor was designated as an SSSI by Natural England in recognition of its significance as the most diverse example of upland plant communities in West Yorkshire, 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. Sites with SSSI status 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. The proposed Calderdale Wind Farm would completely destroy the wild moorland habitat on Walshaw Moor and is therefore illegal as it contravenes SSSI regulations on multiple fronts.

Walshaw Moor's environmental and ecological significance is also underlined by the fact that it has been designated as a Special Area of Conservation (SAC) and as a Special Protection Area (SPA), both classified under Conservation of Habitats and Species Regulations 2017. Walshaw Moor's SPA status specifically relates to the conservation and protection of wild birds, as this site is nationally important for its 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 (NERC) Act 2006. As in the case of SSSIs, SAC and SPA regulations are legally binding and impose strict restrictions on what activities not allowed on these sites, which it is the responsibility of Natural England to enforce.

The installation and running of the proposed Calderdale Wind Farm would cause huge, widespread and irrevocable environmental and ecological damage to the wild moorland habitat and to the rare flora and fauna throughout the Walshaw Moor Estate. The Estate includes not only Walshaw Dean with its three reservoirs extending towards Stanbury Moor and Haworth Moor, but Widdop Moor above Widdop Reservoir and along Great Edge as far as Boulsworth Hill in Lancashire. The Walshaw Moor Estate also includes extensive areas of Wadsworth Moor directly above Hardcastle Crags and Crimsworth Dean, and Shackleton Moor between the two valleys.

As well as turning the Walshaw Moor Estate into an industrial wasteland, the wind farm would have disastrous knock-on effects on the habitats and ecosystems of nearby land in the Upper Calder Valley, not just the moorland uplands but the hillside meadows, woodlands and steep river valleys to which the uplands are ecologically linked. As previously mentioned, key neighbouring sites include the National Trust estate of Hardcastle Crags and the adjoining valley of Crimsworth Dean, which is also partly owned by the National Trust, both of which are of national and international importance for their rich and varied habitats and for their rare flora and fauna. The Walshaw Moor Estate includes Blake Dean at the head of Hardcastle Crags, and the hills encircling Crimsworth Dean at the upper end above Grain Water. If the wind farm went ahead, both dales would be hemmed in by turbines at either end, as well literally in their shadow throughout their length.

The proposed 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, for example, would have dire consequences for colonies of the same species (notably curlews, lapwings, oystercatchers and golden plovers) 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 Hardcastle Crags and Crimsworth Dean as well.

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 and ecology of the whole of the Upper Calder Valley, the proposed scheme is patently inappropriate and should be ruled out purely on these grounds by both Natural England and Calderdale Council.