

# Consultee Comments for Planning Application 23/06010/EIA

## Application Summary

Application Number: 23/06010/EIA

Address: Walshaw Moor Estate Widdop Road Heptonstall Hebden Bridge Calderdale

Proposal: Scoping opinion

Case Officer: Richard Riggs

## Consultee Details

Name: Wadsworth Parish Council Cllrs

Address: The Town Hall, St George's Street, Hebden Bridge, Calderdale HX7 7BY

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On Behalf Of: Wadsworth Parish Council

## Comments

WADSWORTH PARISH COUNCIL

Wadsworth Parish Council would like to submit the following document for consideration.

Please find outlined below detailed comments on the Calderdale Wind Farm Scoping Report, dated September 2023.

The comments are shown under the relevant chapter heading / sub heading.

Please note these comments should be viewed as preliminary in nature due to the short time available for comment, and Wadsworth Parish Council reserves the right to provide more feedback following the undertaking of a more detailed analysis of the Report.

1.Introduction 6

1.1. Background and Context 6

1.2. Need for the Development 6

You State:

There are many areas across England that can be realised as onshore wind developments.

Realisation of wind

developments provide a direct source of green energy to the surrounding area. In addition to providing energy from

renewable sources, investment in a wind project can also incorporate habitat management plans

(HMPs),

biodiversity net gain (BNG) within the development footprint to provide additional benefits to local biodiversity and the community.

Comment:

There also has to be an acceptance that these developments need to be in the right location. Also, even with the inclusion of Habitat Management Plans the existing plant and wildlife ecosystems will be irrevocably damaged. Evidence for the statements above needs to be provided to allow validation of the claims made.

1.3. The Applicant 7

1.4. Consultants 7

1.5. The Purpose of the EIA Scoping Report 7

1.6. Environmental Impact Assessment 7

2. The Proposed Development 8

2.1. Location 8

2.2. The Site 8

You State:

There is a network of tarmacked roads leading up to the main site entrances, beyond the tarmac roads there is a network of compacted dirt tracks.

Comment:

You have not defined what you consider to be site entrances. Access to all site borders is predominantly via B roads (with the exception of the A6033 from Hebden Bridge to Keighley). Furthermore, all roads leading to the site contain significant hazards including narrow areas, steep gradients, sharp bends etc. It is impossible to think of a route that would allow the transport to site of the towers (even in pieces) or the blades required for the windfarm.

The turbine blades anticipated to be 75 metres in length will require special transportation vehicles and large cranes to erect them which are unlikely to be able to negotiate gradients greater than 1 in 10. The site falls from a maximum elevation of 463 m at Heather Hill (T21) falling to 290 m at Blake Dean, (T52). Road construction to access each turbine location will necessarily require either large earthworks to iron out the steep gradients or bridge structures to span the cloughs and

undulating landscape. Earthworks will require large quantities of either locally won or imported fill materials which will involve large consolidation settlements of the peat and longtime delay periods to surcharge the peat to raise the earthworks to suitable heights. Bridge structures will require heavily engineered foundations and large heavy equipment to construct.

### 2.3. The Proposed Infrastructure 8

Comments:

At present there is no detail regarding the amount of potential ground mounted solar PV, so there could be hundreds of acres covered. You state that this would be southerly facing so you must have some idea of the potential coverage. Details of the possible locations should be placed in the public domain immediately.

Decommissioning:

More detail is required as to the degree of decommissioning. Leaving the turbine bases / crane pads / roads etc. would not be acceptable.

## 3. Project Design 9

### 3.1. Wind Turbines, Foundations, Transformers and Crane Pads 9

Comment:

If the foundations need to be 4 metres deep where do you propose putting the ground that you will need to dig out? As this is primarily peat it will be destroyed in this process, releasing huge amounts of carbon.

We have available details of foundations for similar sized turbines (Vestas V117-4.2MW 90mHH), these are 23 metres diameter, 3.3 metres thick at the centre tapering to 400 mm at the edges. This will entail at least 1000 m<sup>3</sup> of excavation and around 700 m<sup>3</sup> of concrete per wind turbine. Taking this as a whole this equates to around 65,000 m<sup>3</sup> of excavation (of peat) and 45500 m<sup>3</sup> of concrete (109,000 tonnes), 7583 trucks and hence 15166 journeys to and from the site.

Secondly, more damage will be caused by the building of the crane pads which along with the access roads will need to remain to maintain the turbines over their 30 year life. These will cause consolidation settlement of the peat by up to 1.0 metre, reducing its permeability. The large excavations and consolidation settlements will change the hydrology of the peat bog reducing its ability to hold water and thereby increasing run-off and hence flood risk to the surrounding valleys of Crimsworth Dean, Alcomden and Hebden Water.

Crane mat and road construction will entail the importation of many tens of thousands of tonnes of crushed stone with truck journeys far exceeding those detailed above.

### 3.2. Solar PV 9

Comment:

You state that you HAVE identified a site for the potential solar panels. Please can you therefore share this information now.

### 3.3. Battery Storage 9

Comment:

You state that this will take up a small area and then go on to state that a 50MW system would fit into an area of 1 hectare. This is not a small area.

### 3.4. Site access 9

Comment: As stated earlier access to this site is severely restricted by poor local A and B roads. It is inconceivable that this proposal is being put forward without this aspect being reviewed in detail at this stage, as it is quite likely that there is no acceptable route. Furthermore, any route used will lead to huge local disruption.

### 3.5. Access Tracks 10

### 3.6. Borrow Pits 10

Comment:

The use of borrow pits would lead to irreparable damage to the peat in the locality of the pit, as well as leading to landscape change on an enormous scale

### 3.7. Temporary Construction, Storage and Ancillary Infrastructure 10

Comment:

You propose to leave the hardcore base after construction work has finished. Re-vegetation will not replace the peat lost in the development of the temporary construction facility.

3.8. Construction Environment Management Plan 10

3.9. Grid Connection 11

4. Cumulative Developments 11

Comment:

The cumulative developments are all far smaller than the proposed development, with even the largest being only providing c 20% of the proposed output from this site (Scout Moor 65 MW)

5. Planning and Energy Context 12

5.1. Introduction 12

5.2. Energy Policy 12

5.3. Planning Policy 12

You report states:

This will mean local policy on onshore wind continues to be decided by elected local councillors, accountable to local people, and plans are taken forward where they can demonstrate local support and address planning impacts identified by the community.

Comment:

Wadsworth Parish Council accepts this as the way forward and states that this development should not go forward without local support.

6. Ornithology 17

6.1. Introduction 17

6.2. Baseline Description 17

6.3. Guidance and Legislation 17

6.4. Work Undertaken to Date 19

6.5. Interim Survey Results 26

6.6. Additional Proposed Surveys 27

6.7. Assessment Methodology 28

6.8. Proposed Mitigation 32

6.9. Potential Impacts 32

6.10. Matters Scoped out of EIA 33

## 6.11. Questions for consultees 33

### Comment:

Wadsworth Parish Council supports the points raised in the consultation responses already submitted by The National Trust and Bradford Metropolitan District Council. We will defer to the expertise of Natural England and the RSPB.

One point to note: The report states that the annual red grouse shoot is expected to be halted if the development goes ahead. This wording is not acceptable and the cessation of grouse shooting on the moor should be a legal requirement included in planning permission should the development go ahead.

## 7. Landscape and Visual 34

### 7.1. Introduction 34

#### Comment:

You state that: The approach to scoping the LVIA concentrates on the proposed wind turbines, as it is these elements that would be seen over the greatest area and have the potential to affect a larger number of landscape and visual receptors.

This is not acceptable. As stated previously you note that you have identified potential sites for the solar panels but you have not shared these site locations in this report. Please put this information into the public domain as soon as possible. Solar panels can also have a significant impact on the environment (glare etc.) and so consultees are entitled to be provided with more information regarding your potential plans for solar panels even at this early stage.

### 7.2. Baseline Description 34

#### Comment:

In 7.2.3 you accept that the development will be visible from the following:

Yorkshire Dales National Park

Peak District National park

Forest of Bowland AONB

Nidderdale AONB

Calderdale Special Landscape Area

So the visual impact of this development will be huge, impacting on the views from a number of important locations.

7.2.4 and form 7.3.

The locations suggested for the LVIA are not acceptable in their current form, and the locations used in this report to show the views of the windfarm from various locations are totally unacceptable. There are a number of locations that need to be added to the list and these have already been suggested in the response from Bradford District Council. These are:

Lad Law on top of Boulsworth Hill, to the West of the site

High Brown Knoll, to the west of the site

Stoodley Pike

Pennine Way as it goes from Oldfield to Cowling

Pennine Way at the high point south of Top Withens

In addition to these the following need to be added:-

Ovenden Moor

Crow Hill NW of Midgley

Cock Hill summit, on the A6033 from Hebden Bridge to Howarth

If the aim of this report was to provide an honest representation of the potential impact of this development the inclusion of photographs from the obvious high points such as Cock Hill should have been obvious to the report authors. The lack of the inclusion of photos from areas where the view will be massively impacted (even at this early state) is wholly unacceptable and frankly misleading.

7.3. Guidance and Legislation 43

7.4. Work Undertaken to Date 44

7.5. Study Area 44

7.6. Proposed Scope of Assessment 44

7.7. Assessment Methodology 45

7.8. Proposed Mitigation 46

7.9. Potential Impacts 47

7.10. Matters Scoped out of EIA 48

7.11. Questions for consultees 48

8. Ecology 49

8.1. Introduction 49

8.2. Baseline Description	49
8.3. Guidance and Legislation	50
8.4. Work Undertaken to Date	51
8.5. Study Area	55
8.6. Assessment Methodology	56
8.7. Proposed Mitigation	56
8.8. Potential Impacts	57
8.9. Matters Scoped out of EIA	58
8.10. Questions for consultees	59

Comment:

Wadsworth Parish Council agrees with the following comments submitted by Bradford District Council. See below:-

## Section 8 Ecology

The Catchment Recovery Plan being implemented on Walshaw Moor aims to restore Irreplaceable Blanket Bog Habitats. EIA of effects on habitats and other ecological features should consider the improving baseline habitat conditions that would be expected if the CRP was to continue in the absence of the wind farm scheme. The assessment of impacts and effects should include consideration of habitat condition and species distribution changes likely to occur as a result of the cessation of grouse moor management.

As the site includes Irreplaceable Habitats and Very High and High Distinctiveness habitats and the scheme would adversely affect significant areas of these protected and valuable habitats, it will not be able to achieve an overall Biodiversity Net Gain, which will be mandatory after January 2024. A minimum 10% BNG for habitats of lower distinctiveness will be required. The EIA should assess and describe how habitat restoration works, whether part of bespoke compensation and enhancement strategies or as required for BNG will result in positive outcomes for habits and associated species. Habitat function for protected and notable species as well as other ecosystem services like water storage and carbon capture should be referenced in the Ecology section of the EIA.

In response to the question poised for Ecology

Question 17: Do consultees have any comments regarding the EIA only concentrating on those receptors which may be subject to significant effects from the Proposed Development (either directly or indirectly)?



The Ecology Section of the EIA should follow CIEEM guidance on EclA. This means it should include description of the process by which individual ecological features are judged to be important or not. It also means the EIA should include explanation for how the conclusion of no significant effect has been arrived at for each ecological feature judged to be important.

Whilst we believe that the description of the assessment methodology in the scoping document fits our preferred approach, we are unclear that it matches what is suggested by this question.

Question 18: Table 8.4 above notes the receptors and potential impact proposed to be included within the EIA. Do consultees agree with the list of receptors and impacts to be included within the EIA Report?

No. Reptiles and amphibians should be scoped into the assessment. These are declining species, with additional legal protection. The EIA should offer a means by which beneficial effects of the required habitat enhancements for reptiles can be described.

We understand that the scheme may involve the planting of a large number of trees. The EIA should assess the adverse impacts of this tree planting on blanket bog and heathland habitats as well as lower priority habitats. Calderdale supports areas of long term pasture with internationally significant populations of CHEGD fungi. Tree planting and woodland creation schemes often overlook the impacts of the loss of these diverse and increasingly rare habitats.

Question 19: Do consultees have any comment regarding this sufficiently covering the potential impacts on features from the Proposed Development and what is proposed to be scoped out?

Assessment of effects on species should look at the impacts of habitat changes likely to occur in the short, medium and long term. Changes to site hydrology have the potential to affect blanket bog habitats over differing time frames with the resulting changes to habitat composition and suitability for different species. It will be important to consider the findings of hydrological and hydrogeological assessments in the assessment of effects on habitats and species.

## 9. Geology Peat Hydrology and Hydrogeology 60

### 9.1. Introduction 60

- 9.2. Baseline Description 60
- 9.3. Guidance and Legislation 60
- 9.4. Work Undertaken to Date 61
- 9.5. Study Area 63
- 9.6. Proposed Scope of Assessment 63
- 9.7. Assessment Methodology 64
- 9.8. Proposed Mitigation 65
- 9.9. Potential Impacts 66
- 9.10. Matters Scoped out of EIA 67
- 9.11. Questions for consultees 67

## 10. Noise 68

- 10.1. Introduction 68
- 10.2. Baseline Description 68
- 10.3. Guidance and Legislation 68
- 10.4. Study Area 68
- 10.5. Proposed Scope of Assessment 69
- 10.6. Assessment Methodology 69
- 10.7. Matters Scoped out of EIA 70
- 10.8. Questions for consultees 73

## 11. Cultural Heritage 74

- 11.1. Introduction 74
- 11.2. Baseline Description 74
- 11.3. Guidance and Legislation 74

## 12. Access, Traffic and Transport 90

- 12.1. Introduction 90
- 12.2. Assessment Methodology 90
- 12.3. Water Preferred Policy 92

You state:

Noting that the nearest ports Goole is 100km by road whereas Ellesmere Port 96 km by road directly (via the most likely AIL route). Given the low difference in distance between these two options it is proposed that the Applicant will select the preferred route to minimise improvement works required to the public highway.

This shows you accept that major road improvement projects may be needed in order to provide

access to the site. Consideration therefore needs to be given to the disruption etc. caused by these works, as well as other wider societal and environmental issues caused by the works.

12.4. Baseline Traffic 92

12.5. Scoped Out Effects 93

12.6. Consultee Questions 93

13. Socio Economics, Land Use, Tourism and Recreation 94

13.1. Introduction 94

13.2. Study Area 94

13.3. Baseline Description 94

13.4. Guidance and Legislation 95

13.5. Work Undertaken to Date 96

13.6. Proposed Scope of Assessment 96

13.7. Assessment Methodology 96

13.8. Proposed Mitigation and Enhancement 97

13.9. Potential Impacts 97

13.10. Matters Scoped out of EIA Assessment 98

13.11. Questions for consultees 98

Comment:

Whilst this looks to a reasonable approach to future analysis there needs to be an immediate acceptance of the global importance of Bronte Country near Haworth. This proposed development will be within 300 metres of some of the key Bronte sites, and the wind turbines will be visible from almost all key Bronte sites (Top Withens etc.).

14. Aviation 99

14.1. Introduction 99

14.2. Baseline Description 99

14.3. Guidance and Legislation 99

14.4. Work Undertaken to Date 100

14.5. Study Area 100

14.6. Proposed Scope of Assessment 100

14.7. Assessment Methodology 100

14.8. Proposed Mitigation 101

14.9. Matters Scoped out of EIA 101

14.10. Questions for consultees 101

Wadsworth Parish Council support the views expressed in the submission from The Defence

Infrastructure Organisation.

15. Other Issues 102

16. Conclusion 104

17. Summary of Questions for Consultees 104

Figures 107

Appendices 115

Appendix 1: Grade II listed buildings within the 5 km Study Area 115

Appendix 2: Grade II\* listed buildings within the 15 km Study Area 132

Appendix 6.1 Breeding birds transect surveys March - July 2022

Confidential species - submitted separately. 137

Appendix 6.2 Breeding birds vantage point survey July 2022 138

Appendix 6.3 Passage and wintering vantage point surveys October  
2022 - February 2023 139

Appendix 6.4 Passage and wintering transect survey 2022 140

Finally, as a concluding comment, I think there is a widely held assumption that wind farms are good from a CO2 point of view. Future analysis of the potential impact of this project needs to evaluate the true CO2 balance sheet for this project, taking into account all CO2 inputs involved in the construction of the potential windfarm, as well as the potential savings over the 30 year lifespan of the development. In addition to this there needs to be an acceptance that the potential power generated by the wind farm is not reliable and only works when the wind blows, so other sources of power, will still be needed and in the short , medium and long term these will include oil, gas and nuclear. In isolation wind farms are not the answer.

Wadsworth Parish Council

Friday 27th October 2023