



**National
Trust**

**CALDERDALE ENERGY PARK
STATUTORY CONSULTATION**

RESPONSE OF THE NATIONAL TRUST

JUNE 2026

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1.0 Summary of National Trust Objection

1.1 Background & summary of National Trust position

The National Trust has consistently raised significant concerns about the proposal by Calderdale Energy Park to construct a windfarm on Walshaw Moor due to the impacts of this development on the environment, the landscape and cultural heritage of the District. [Scoping response 2023 ref 23/06010/EIA & Non-Statutory Consultation June 2025]

The National Trust is a charity and Europe's largest conservation organisation, with a current membership of over 5 million people. With the support of our Parliamentary Act, we are legally responsible for the protection of some of the most beautiful, historically important and environmentally sensitive places in England, Wales and Northern Ireland.

The National Trust will comment on proposals where they:

- Directly or indirectly impact our assets;
- Have the potential to negatively impact the promotion of our charitable aims; or
- Are contrary to our planning principles.

We are supportive of renewable energy as a matter of principle and believe that appropriate development can play an important role. We understand that decision makers will increasingly need to give weight to the importance of reaching net zero, and that this could result in some effects to landscape, the environment and places of significance, however we believe this should be avoided where possible.

We therefore take an evidence-based approach when responding to any proposals involving Major Infrastructure.

Whilst there is no prescribed format as to what the Preliminary Environment Impact Report (PEIR) should comprise - a good document is one that enables consultees to understand the likely environmental effects of the Proposed Development and helps to inform their consultation responses on the Proposed Development during the pre-application stage. (NSIP advice note 7)

Whilst this is an intentionally preliminary stage in the DCO process, there is significant survey work to be completed and the layout itself to be finalised, meaning consultees have not been suitably informed across many areas. The connection to the Grid is not yet confirmed and in the absence of this, we consider this proposal to be premature.

Given the sensitivity of the local environment designated as SPA, SAC and SSSI, there are significant adverse impacts identified for irreplaceable habitats (blanket bog) and for species that rely on those habitats and hydrological impacts that are currently unknown.

The PEIR does not demonstrate that the mitigation hierarchy has been followed i.e. how impacts have been avoided, there is no assessment of what reasonable alternatives have been explored and given that 80% of the turbine area comprises deep peat avoiding that harm (as required by national policy) needs to be demonstrated. There is no confidence that any suitable mitigation or compensation could be provided to offset that harm. On this basis the National Trust objects to this development.

National Trust considers the priority for this site should be its invaluable contribution it provides for nature and people in the South Pennines and other locations with fewer environmental constraints should be prioritised for wind energy.

We note the intention to submit the Development Consent Order in November 2026. National Trust would welcome further engagement ahead of the submission itself.

The absence of comment across the specific topics that follow does not indicate our support or agreement with the conclusions reached at this stage. We may resolve to raise additional matters or other areas of focus once further evidence has been presented.

1.2 Summary of areas of concern

The specific concerns for the National Trust are

- There is no demonstrable evidence that the project avoids deep peat – and fails therefore to comply with National Policy (NPS -EN-3)
- At PEIR stage the development would result in a range of unacceptable impacts, including loss of, and risks to irreplaceable habitats and species of the South Pennine Moors SAC and SSSI (contrary to NPS- EN-1) with
- Significant adverse effects for Ornithology at an international scale for the South Pennine Moors SPA, and at a national scale for the South Pennine Moors SSSI.
- These are **fundamental concerns** which make the site unsuitable for any significant infrastructure development in principle.
- The absence of Hydrological information to understand Flood Risk and impacts on watercourses, particularly the smaller watercourses where headwater streams in northern England have a high degree of naturalness.

- The significant harm to the recreational resource for the nearby urban populations, arising from changes to landscape character with related health & well-being impacts which cannot be mitigated.
- Insufficient assessment on the impacts to cultural Heritage and on the visitor economy of the area.
- The absence of reasonable alternatives that have been examined and
- No detail of the proposed habitat mitigation and compensation strategy and whether additionality can be demonstrated for residual effects.

1.3 Summary - National Trust Hardcastle Crag

For Hardcastle Crag the concerns relate to

- Hydrology; flood risk, water quality and flows relating to Hebden Water, Hardcastle Crag, Gibson Mill complex and in particular on the Local Wildlife Site designated Woodland (PAWS / ASNW, possible temperate rainforest) and Ancient Grasslands (of international significance for CHEGD fungi and in NE's pipeline for SSSI designation).
- Landscape & Visual Impacts and heritage impacts on the setting of Gibson Mill from within the complex and within the wider estate (the Crag).
- Construction impacts for visitors and on their experience of place as an accredited 'woodland of Sanctuary' under the City of Sanctuary scheme
- That estate roads must not be used for construction purposes and subsequently during operation and maintenance of turbines.

The National Trust wishes to see these concerns fully addressed.

2.0 General observations

2.1 Insufficient information for assessment purposes

Many additional surveys, technical assessments and detail of mitigation measures are promised in the ES; however, leaving the presentation of this material to the DCO leaves insufficient time for public and stakeholders to engage with the detailed content of the proposal. **Further consultation should take place ahead of the DCO submission.**

Adoption of the 'Rochdale Envelope' and the use of 'reasonable worst-case scenarios' within the EIA process is understood, however, this must be based on a realistic set of parameters

for the development. Sufficient technical drawings must be provided for assessment purposes and consideration of impacts such as depth of peat and habitat loss or carbon calculations must not be under reported or optimistic evaluations included which do not represent the ‘worst case’. **A full range of realistic parameters for all aspects of the Project must be identified.**

Figure 4-1 ‘construction phase layout’ plans are not sufficiently detailed to identify the impact of the construction areas on habitats; in relation to concrete crane hard standings or to discern lengths or widths of permanent roads and temporary trackways and the colours are difficult to read.

(4.3.13) There is specific reference to ‘sink’ the on-site substation into the landscape for screening, noise mitigation and landscape and visual effects; but no plans available to review **and no visualisations included** with the wirelines in the LVIA.

There is no Information on the extent of the borrow pits, the depths of excavation, nor environmental impacts. It is not possible to make an informed response; other than they are likely to have significant adverse effects on habitats.

Whilst turbine tip height is defined, the dimensions of the structures are not provided. Some examples are provided but these are buried across a range of chapters **with little transparency**. Turbine foundations are likely to be 4m, however, there are no construction details and intrusive ground investigation is intended post-consent (4.4.6); but as ground conditions are likely to influence peat extraction volumes and carbon calculations being relied upon for the proposal this is **considered unacceptable**.

Technical drawings/site sections should be provided together with **an accurate and complete description of all development components**, clearly identifying the extent of hard surfacing that will remain in situ on site (with permanent impacts on habitats identified) so that a considered assessment of the parameters for this development can be undertaken.

2.2 Alternatives & Design evolution

We are **concerned** that information on the consideration of alternative sites is not provided at PEIR stage. PEIR 5.5.2 states that a ‘robust’ site selection process ‘*is being carried out*’, comprising a number of detailed appraisal stages, ‘*to validate*’ the chosen PEIR Boundary. This suggests this work is rather after the event, and not a genuine site selection process as an integral part of the EIA process. Without publishing this information at PEIR stage there has been **no transparency** to this part of the process.

3.0 Impacts on Peat

3.1 National Trust position - development on Peat

The National Trust recognises that the climate and nature crises are the greatest threat to places in our care. These are twin crises, which must be addressed together.

Ecologically functioning peatlands are an irreplaceable habitat and sequester and store carbon. As The UK's largest terrestrial carbon store ([Nature for people, climate and wildlife - GOV.UK](#)) they are one of our greatest weapons in the fight against climate change. They provide vital habitat for some of our most threatened species and preserve unique archaeological and palaeoecological records. Activities and siting of development on peatlands can result in damage to the historic environment, to peatland function and associated species, habitats and wider ecosystem services. Damaged peatlands shift from storing and capturing carbon to becoming a source of carbon and other greenhouse gases. (IUCN [Peatland and Development March 2023 - FINAL.pdf](#))

We believe that precaution must therefore be taken when proposing to develop on peat for any purpose.

Particular tensions arise in connection with proposals for development of renewable energy infrastructure on Peatland. The National Trust believes strongly in the need to grow renewable energy and reduce the UK's and the Trust's use of fossil fuels. The UK needs, at a minimum, to achieve net zero carbon by 2050 or earlier. The National Trust is targeting net zero carbon across our whole value chain by 2030 and as such we are supportive of renewable energy as a matter of principle. However, this does not override the need for precaution in relation to peatlands.

In the Trust's view, and in line with national planning policy, development on peat should be **"wholly exceptional"** and only undertaken where a suitable compensation strategy exists. Relevant considerations for NT include:

- a. The quality and availability of the evidence base to support decision making;
- b. That the mitigation hierarchy has demonstrably been adopted, including the consideration of alternative options;
- c. That evidence-based mitigation and restoration best practice methods will be adopted as necessary;

- d. The availability of suitable compensation measures and robust and well-evidenced carbon offsetting;
- e. Whether any preexisting carbon or biodiversity credits, or other environmental gain has been achieved on the land in question to offset environmental harm elsewhere.

For this proposal, we are not satisfied that these steps have been followed. Indeed, **the PEIR evidence has reinforced the significance of peat across this site.**

3.2 Peat Depth Survey Report & Outline Peat Management Plan (oPMP)

The Peat depth survey report indicates that of the 8,263 probe locations, only 2,210 (26.8%) recorded depths of 0–0.3 m, while the remaining 6,053 (73.2%) recorded depths between 0.3 m and 5.7 m.

The interpreted peat depth mapping indicates that peat exceeding 0.3 m in depth is present across 82.1% of the Peat Survey Area and across 79.4% of the proposed infrastructure locations. This demonstrates that peat is largely continuous across the majority of the site, with substantial areas exceeding 1 m in depth. The deepest peat recorded reaches up to 5.7 m within the eastern central part of the Peat Survey Area.

The Outline Peat Management Plan (OPMP) states that only three turbine areas are proposed in peat depths averaging > 1.0 m – T10, T28 and T30 and given the extent of peat on the Turbine Area, the claim is made this is evidence of effective layout planning in terms of the deepest peat present. Whilst this may be true the statement is disingenuous when all the turbines (apart from T32) are actually sited on locations above the Natural England threshold of deep peat above 0.3m. (As Figure 10.3.3 [Table 4.2 Turbines & Peat depth] of the Outline Peat Management Plan confirms.)

There is also **a fundamental concern** in how the applicant has applied peat classification. The peat depth report applies a threshold whereby soils of less than 0.3 m depth are classified as “no peat.” This approach is not consistent with current ecological understanding or documentation from Natural England.

Natural England (2025) Definition of Favorable Conservation Status for Blanket bog RP2967 recognises 0.3 m as a practical threshold relevant to vegetation and rooting conditions, but not as a strict definition of peat. Peat is defined by the accumulation of waterlogged organic material, and blanket bog may occur on peat shallower than 0.3 m, particularly at site margins or where influenced by topography or historic land use. Such areas are explicitly recognised as forming part of the hydrological unit of the peat body.

By classifying all soils below 0.3 m as “no peat,” the assessment has underestimated both the extent and functional connectivity of the peatland system. Shallow peat can play a critical role in maintaining hydrological integrity, including water storage, flow regulation, and the support of peat-forming processes. As such, **potential impacts from infrastructure development should not be discounted solely on the basis of peat depth.**

From the Peat Depth Survey Report figure 10.10 does not clearly demonstrate that probing at 50 m intervals with 10 m offsets has been consistently applied along all proposed and existing tracks. For example, the track between T33 and T22 does not appear to show probe locations at the specified interval or offset. **Clarification** is therefore required as to whether this methodology was fully implemented across all access tracks.

The report states that, in some cases, peat may be absent and the probe may penetrate entirely through silt or clay sediments. This appears **inconsistent** with the dataset, which records 18 categories of potential substrate across 6,409 probe locations. If substrate identification is based on tactile feedback during probing, it would be expected that distinctions between silt and clay could be made with a reasonable degree of confidence. **Further clarification** on how substrate types were determined, and the level of confidence in these classifications, would be beneficial.

It is clear that peat volumes excavated along the access routes and cable corridor have not been included and moreover excavation volumes are based on average peat depth underlying the proposed infrastructure. The plan to do a more detailed calculation once the design has been finalised (page 22). This means **total impacts assessed within the PEIR are uncertain and cannot be relied upon** (page 23).

Taken together, these issues indicate that the current assessment has **underestimated both the extent and importance of peat** within the site.

3.3 Application of the Mitigation Hierarchy

National Policy Statement EN 1 [5.4.43] states that as a general principledevelopment should, in line with the mitigation hierarchy, aim to avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives. Where significant harm cannot be avoided, impacts should be mitigated and as a last resort, appropriate compensation measures should be sought.

Avoidance

The oPMP states that it adopts a mitigation hierarchy of prevent, reuse and recycle, however: the plan acknowledges that avoidance of peat is limited due to the extent of peat across the site and the scale of the Proposed Development (page 10).

Although some turbine relocations and reductions have been made (page 10), a large proportion of infrastructure remains located on peat. The average peat depth at turbine bases is approximately 0.61 m (page 24), with several turbines located on peat exceeding 1 m in depth (page 25).

There is **no clear evidence** that site selection or layout design has been driven primarily by peat avoidance, nor that alternative configurations with reduced peat impacts have been fully explored.

Minimisation

Some measures to reduce impacts are identified, including: Refinement of turbine locations, use of floating tracks where feasible, potential future design optimisation (page 11). However, given that so much of the site is underlain by peat greater than 0.3 m in depth (82.1%) we do not consider that such measures will have much demonstrable effect. Approximately 559,645 m³ of peat is expected to be excavated, of which 387,057 m³ will be permanently excavated and 172,588 m³ temporarily excavated (page 27).

Mitigation through reuse

The oPMP relies on peat reuse and reinstatement to address impacts. A near-neutral mass balance is presented, with total reuse volumes approximately equal to total excavation (page 33). However, **a peat mass balance does not equate to restoration**. Peat soils can be considered an “ancient” habitat; they accumulate at approximately 1mm per year, meaning soils and associated hydrology, topography and trophic complexity across the site have developed over millennia. Excavated peat is subject to structural disturbance, potential oxidation and carbon loss, altered hydrology and reduced ecological integrity, therefore even after decades of restoration effort, this peat is unlikely to return to its undisturbed condition. As such, **the assumption that reuse delivers “no net loss” is not sufficiently justified** (page 11).

Compensation

The oPMP states that where peat is reused to help reverse degradation of peatlands caused by previous natural erosion processes and management impacts, it can be considered restoration, provided that the outcomes achieve an improvement in peatland condition. These reuses of peat include restoration of peat cuttings, dikes, pits/quarries and gullies by infilling with excavated peat (pages 29-31). However, these 'restoration' measures relate to existing **degraded peatland features which ought to be undergoing restoration regardless of the current proposal.**

The peatland restoration opportunities described are simply a way of reusing the excavated peat on site, **not necessarily** the best interventions to achieve improved hydrological condition or ecological function of the peatland. If successful, these restoration measures may improve baseline condition but will not compensate for direct and indirect (**i.e. through changes in hydrology**) **loss of habitat due to the development.**

While good practice for monitoring is outlined, **it is not clear** what monitoring is specifically proposed for this site, how long monitoring will continue and what measures will be put in place if the described restoration fails.

Peatland Condition

The peat survey area contains extensive peat deposits, estimated at approximately 22,250,000 m³ with widespread blanket bog habitat (page 14). Although much of the site is described as modified or drained, it remains a significant carbon store and a priority habitat with clear restoration potential. **Degraded condition should be viewed as a justification for restoration and protection, rather than as a rationale for further disturbance.**

80% of England's peatlands are degraded ([Peatland factsheet.pdf](#)) the condition at Walshaw should not therefore be used as reason for the development of itself. Furthermore, funding peatland restoration is not contingent on an NSIP happening when such restoration is a stated UK government priority and NT as a charity, along with other organisations have significant experience in securing funding for projects. Again, this cannot be used as a reason to support development in an inappropriate location.

National Policy Statement EN3 'renewables' advises that; Onshore wind farm sites within England may be proposed on peatland, however **'applicants should rule out other locations before siting developments on peatland. In particular, areas of deep peat,**

which have the highest potential for carbon emissions, should be avoided'. (paragraph 2.12.77)

On the basis that the avoidance of deep peat has not been clearly demonstrated and the condition and significance of peat has been under reported, with issues regarding its restoration, NT objects to the development.

4.0 Climate change

4.1 Carbon calculations

A review of the PEIR and accompanying appendix on GHG data has been completed. Whilst we note that generally best practice Life-Cycle Analysis (LCA) estimation and familiar emissions factors from authoritative sources have been adopted; we have found the assumptions presented tend to a series of generous or unsubstantiated assumptions and the assessment does not adopt the approach of reasonable 'worst case scenarios' that is set out as the objective of the PEIR (at 4.2.4). There is therefore an **inconsistency in approach** which should not be followed through into the ES.

We also consider a more thorough carbon calculation is required given that issues around the use of the Scottish Carbon Calculator are well publicised and adopting this without rigorous testing and site-specific relevance, again risks under reporting calculations.

Research on the Carbon Calculator for wind farms on Scottish peatlands: by Edinburgh University has found that while the Calculator remains a valuable tool, its scientific assumptions and emission factors are outdated and require revision to reflect advances in peatland science, restoration practice, and net-zero policy. The assessment highlighted uncertainties in peat-related modules, including peat removal, dissolved and particulate organic carbon losses, and carbon fixation estimates.

4.2 Grid displacement factors

The project makes a relatively generous assumption that it's generation will directly displace gas turbine power generation. This is a very nuanced argument and unfortunately does not have strong consensus across the carbon accounting industry. The criticism is that given the complex ways by which the UK de-prioritises generation on a minute-by-minute basis through merit-order displacement, it isn't a strict guarantee that their generation is displacing gas directly. It may instead be displacing storage, demand response, and other systems which would dilute the impact modelled. This could have a significant impact on the overall quantum of carbon saved.

There is a need to conduct a more thorough sensitivity analysis of grid displacement factors, likely modelling **against a number of UK grid scenarios** rather than just the most beneficial for **more transparency about potential emission displacement** with respect to energy generation. This is more about uncertainty quantification and a presentation of the various potentials which need to be considered rather than any rejection of the methodology itself.

4.3 Peatland loss assumptions

As per our concerns around construction details (see section 2.1); total peat extraction volumes have not yet been reliably calculated and there is no peat condition survey information. Additionally, a significantly sweeping assumption is made that any excavated peat will be lost at a rate of 10%, with the remaining 90% being stored and reapplied on site at a later date to reintegrate with the site. We have **significant doubt** about the feasibility of such a plan. **The project must be clearer** about how this 10% loss claim will be substantiated.

Moreover, there is no mention within the GHG Appendix11-1 as to whether carbon loss from other (non-peat) soil disturbance has/or is being included in calculations. This is relevant to points raised in 5.4 as CHEGD soils contain fungi because they're undisturbed and this means they're also full of undisturbed carbon. **This needs to be clarified and addressed.**

Although other methodological assumptions seem within a reasonable boundary, our own research suggests that a 40kg of dry carbon per m³ peat is on the **lower end of acceptability**. The effective result is that the peatland emissions values are likely **understated** by a fair margin without more detail on how the 90% of extracted biomass will be protected.

In December 2025, DEFRA published an updated environmental improvement plan ([Environmental Improvement Plan 2025 - GOV.UK](#)), which included a commitment to restore approximately 280,000 hectares of peatland in England by 2050. However, recent analysis indicates that we may be significantly off track to meet those targets, and the Climate Change Committee has called for the UK Government to prioritise ramping up peatland restoration. ([UK off track for Net Zero, say country's climate advisors - Climate Change Committee](#)) Currently, the Government plan to spend £85 million by 2030 on peatland restoration. The NT position is that DCMS who determine this DCO must give weight to other government department objectives.

5.0 Biodiversity -Impacts on habitats & species

5.1 Legislative context

National Policy Statement EN-1 4.1.3 contains a presumption in favour of granting energy NSIPs. For critical national priority projects, it anticipates the need case is likely to outweigh the residual effects of the project. However, this presumption in favour, **does not apply** to residual impacts ‘**which present an unacceptable risk to, or interference with, human health and public safety, defence, or irreplaceable habitats**’.

For NT the proposal on SAC/SSSI risks an unacceptable loss of irreplaceable habitats, where no mitigation is outlined and we are not convinced that compensation and demonstrating additionality for residual effects is possible.

The government Environmental Improvement Plan has the commitment to restore 75% of protected sites to favourable condition by 2042. Protected sites Environment Act target delivery plan - GOV.UK Putting wind turbines into peatland SSSIs does not support that if it cannot be evidenced otherwise.

Natural England clearly stated areas of blanket bog in “unfavourable, declining” condition (following Commons Standards Monitoring) then actions to restore that habitat **will not be considered compensation**, as the objectives of the SAC and /SPA include a commitment to restore the extent and condition of habitats to a favourable condition. (Table of engagement 8-4).

Moreover, The Walshaw Moor Estate Catchment Restoration plan (WMECRP) for the South Pennines SSSI covers the development area with a vision that requires ***‘the management of the Walshaw Moor Estate as a beacon of best practice, through the restoration of the moor towards favourable condition to achieve a healthy and resilient ecosystem that supports sustainable land use, internationally, nationally and locally important biodiversity assets, natural flood management and improved water quality; and provides a range of cultural services’***.

It contains a series of integrated measures that are already in place to work together to restore, protect and enhance the blanket bog habitat over the lifetime of the plan. PEIR 8.5.14 states that further restoration work is not currently planned. The PEIR assumes that in respect of the continued management and presence of the supporting habitats, *‘it is reasonable to conclude that the current baseline would not significantly alter’*.

We disagree with this working assumption given there is a clear duty on owners to manage land within a SSSI. The assumption must be that work towards the WMECRP would continue in accordance with existing obligations agreed with Natural England. Assessment of the impacts on habitats and other ecological features therefore should include improving baseline habitat conditions that would be expected if the CRP was to continue in the absence of the wind farm scheme.

It is clear from Natural England comments and the WMECRP that the applicant cannot claim any works of ‘restoration’ of habitats as enhancements or benefits of the proposal as they should already have been happening as outlined by Walshaw Moor and Natural England in the WMECRP.

5.2 Habitat Regulations Assessment

The Proposal is subject to a separate Habitats Regulations Assessment (HRA). Table 8-4 confirms that habitat mitigation and compensation will be consulted on with Natural England and other relevant stakeholders ahead of the final ES. We consider this **information should be shared** ahead of the DCO submission.

Figure 8.3 identifies the Habitat Survey Coverage area. **It is not clear** if habitats beyond the development area will be surveyed in the HRA; as habitats and the movement of species beyond will be intrinsically linked across a wider area.

For the SPA the existing condition and quality of land beyond the boundary will be important; particularly where recent moorland fires may have depleted the quality of neighbouring habitats. The availability of alternative habitat within and beyond the SPA/SSSI for species displaced or avoiding turbines requires a **qualitative assessment**.

5.3 Irreplaceable Habitats

The Habitat Baseline Survey (Appendix 08-3) confirms the vast majority of the Turbine Area comprises Blanket Bog. The (PRAG) risk assessment (Figure A1-11, Annex A1) shows that the Irreplaceable habitats identified as SAC features and of very high distinctiveness and other habitats not considered as irreplaceable but identified as SAC features and of very high or high distinctiveness, dominate the Turbine site.

Table 4-2: (UK Habitat Classification category) explains Blanket Bog and degraded Blanket Bog accounts for 1,126.47 Ha and that areas of blanket bog have actually increased following the initial field mapping that took place. It is a limitation of the survey that areas of

the site have yet to be visited which creates **uncertainty** around the assessment process and suggests that the scale of loss of blanket bog could be **under reported**.

The concern for risks to irreplaceable habitats arises not solely from the proposed turbine construction, but the areas of associated infrastructure works; the creation of concrete crane hard standings and permanent roads, turning heads which are intended to remain in situ (where length and routes are yet to be confirmed) as well as the impacts of temporary trackways on blanket bog. In NT experience, harm can arise from temporary floating trackways laid even for short periods on SSSIs depending on the nature and volume of the traffic using them.

Peat is defined by the accumulation of waterlogged organic material, and blanket bog may occur on peat shallower than 0.3 m, particularly at site margins such areas are explicitly recognised as forming part of the hydrological unit of the peat body. It must be recognised therefore that where tracks are laid across shallower areas this may still impact irreplaceable habitats which **needs to be included**. Both excavated (cut-and-fill) and floating tracks, can significantly disrupt peatland water flow, cause drainage, subsidence, and carbon loss. Excavated tracks often under-drain surrounding peat, while floating tracks compact and compress peat layers, leading to long-term deformation and drying. These effects reduce the peat's ability to store carbon and increase erosion and sediment runoff, with additional pressures arising from greater human and vehicular access (Lindsay et al., 2016). Lindsay, R., Birnie, R., Clough, J. (2016) IUCN UK Peatland Programme Briefing Note No. 12 Tracks across peatlands [online]. [Briefing 12 Tracks across peatlands.pdf](#).

We are not convinced that sufficient consideration has been presented on the likely success of peat restoration measures. If the development proceeds, then long term monitoring to assess the effectiveness of reuse activities must be included. ([Reuse of excavated peat on wind farm development sites | ClimateXChange](#))

Permanent, direct loss of habitat within the SAC and SSSI is calculated at **67.2ha** (8.8.18 & 8.8.28) and with changes in surface and sub-surface hydrology within the Turbine Area a permanent loss of **a further 80ha** of habitat is estimated. However, the calculation is incomplete as loss associated with watercourse crossings is **not included** in the PEIR due to design work not yet completed (8.8.16).

Assessments within the remaining sections of the Western Access Route as well as the Eastern Access Route and Bradford West Cable Corridor have yet to be completed (8.5.4). As

Peat depth here ranges between 40-100cm, **further impacts** on irreplaceable habitats appears inevitable.

The reporting uses an Assessment of effects for hydrology of functional loss of up to 10m of additional habitat beyond the extent of all infrastructure. The applicant's explanation for this is that Scottish regulators have agreed an acceptance of effects being limited to within 10m of excavation. It is **a significant concern** that this standard has simply been adopted **without any testing of the hydrological environment of Walshaw**.

There are 41 watercourse crossing points within the Turbine Area (plus 10-15 within Access Routes). PEIR notes that changes to surface and sub-surface hydrology could result in changes to the volume and quality of water reaching watercourses. **(8.8.141) Further analysis** to model and quantify water volume and quality changes is promised - for the ES. As a result, an assessment of the magnitude of this effect or to rule out significant effects on rivers during the construction cannot be completed. **This lack of evidence around hydrology and how the development may impact on water flows and also interrelated risks for dewatering peat and impact on habitats is a significant concern.** Hydrology at Hardcastle Crag is considered in section 6.0.

Hebden Water flows through Hardcastle Crag Local Wildlife Site (LWS) within 1km of construction areas. PEIR 8.8.10 considers the hydrological connection between the Turbine Area and the designated sites & whether environmental pollution events are likely (8.8.112) and considers, with best practice, there would be a negligible magnitude of impact, and is assessed as Not Significant. However, in the absence of hydrological modelling **we do not agree with the preliminary assessment**.

In respect of decommissioning further detailed descriptions of the nature and extent of activities 'are **not available** at this stage', therefore a full assessment of effects and their likely significance is not possible. (8.4.29). This is a **further concern**.

PEIR 8.6.2 states that the mitigation hierarchy '*will be applied*' to biodiversity (CIEEM 2018); It is intended that plans are refined/develop, and mitigation plans/measures '*will evolve*'. A significant area of irreplaceable habitat is impacted by the proposed development and full effects have **not yet been reported**. Given that such habitats by their nature are irreplaceable, **we are not confident that any suitable mitigation could be provided**. There is no Habitat Mitigation and Compensation Strategy to review and no detail of off- site mitigation measures to demonstrate if additionality for residual effects can be delivered.

Given that the site is surrounded by equally sensitive designations (which will have management plans in place) we do not consider at this stage that this is very likely.

Compliance with the mitigation hierarchy has not been clearly demonstrated in the siting of the turbines. It is clear a worse-case scenario of habitat loss has not yet been presented.

5.4 Impacts on Fungi & Species

There are nine Local Wildlife Sites within 2km of the Turbine Area, which include either individual fungi or fungi/CHEGD assemblages as part of their designated features. These communities are indicator species for grassland habitats of significant ecological complexity which have remained undisturbed for many hundreds of years - often termed "Ancient Grasslands", these are irreplaceable habitats. The South Pennine hillsides are an area of global significance for these species and habitats with many species recorded nowhere else.

Grasslands at NT Hardcastle Crags have been added to Natural England's pipeline for SSSI designation based on their significance for CHEGD fungi. PEIR Table 8-1 indicates the importance of the wider area to fungi and to the development of diverse CHEGD assemblages.

The Turbine Area is noted for potentially supporting a CHEGD fungi assemblage of **international importance** - yet no further surveys are planned. **This is unacceptable** given the potential impact of the development on these communities. Considering the challenges of effective surveying for CHEGD in the timeframe available (tight survey season, fruiting bodies may not be present in any given season etc); as a minimum, eDNA techniques should be applied to identify CHEGD species present. (Table 8-11). The PEIR notes Fungi can be highly sensitive to changes in environmental conditions and are also susceptible to damage (8.8.275). As changes to hydrology can also result in permanent loss of fungi through both drought or water logging, it is essential that **once hydrological modelling** has been completed the impacts on Fungi **inside and outside the site boundary are re-assessed**.

Given the significance of this feature, there should be a **comprehensive and robust assessment** of impacts.

CHEGD communities are extremely sensitive to soil disturbance and changes in hydrology. The majority of CHEGD species are only present on sites where soils and nutrient levels have remained undisturbed for at least 100 years. It is not therefore possible to restore disturbed CHEGD grasslands, or create new ancient grasslands elsewhere as a mitigation measure.

At this stage there is **no guarantee** that a low-medium magnitude of impact on CHEGD fungi will occur as there are no 'given' enhancement of habitats and proposed details of

environmental measures are **not yet identified**. Given that Calderdale Council and NT have experience of CHEGD projects we would welcome input to any proposed enhancement measures.

Significant areas of suitable habitat exist for water vole within the Turbine Area and sightings have been made by NT staff. The PEIR acknowledges on a precautionary basis, a significant adverse effect cannot be ruled out at this stage and further survey is required. **We agree this work is essential.**

For watercourses; it is noted surveys of the 41 crossing points will be undertaken during 2026 to examine the riparian habitats at each location. This information will be used with hydrological modelling to identify the least damaging crossing point. This should be undertaken within the context of the **naturalistic river assessment** recommended within our hydrology response below.

Across the biodiversity chapter it is apparent that significant adverse effects cannot be ruled out, and **the scale of impacts to species remains to be quantified**. There is extensive further survey work outstanding. **The PEIR does not enable an informed view to be reached on impacts and it is a concern that the Habitat baseline report is 'draft' only.**

5.5 Ornithology

The PEIR accepts that significant environmental effects of the Proposed Development are likely across all phases of development; during the construction, operation and maintenance, and decommissioning.

PEIR 9.5.21 notes that the breeding bird assemblage (108 species) represents a **diverse and important** upland community, characteristic of the South Pennine uplands.

There is a diverse raptor assemblage (10 breeding species), encompassing the SPA and SSSI. All five UK owl species breed within the study area, and the PEIR notes (9.5.26) that this is **an unusually complete assemblage for an upland area**. (9.5.33) Non-breeding bird surveys recorded a total of 86 species. It is **not surprising** that this highly designated sensitive environment supports a diverse and significant range of bird species.

The PEIR records for the South Pennine Moors Phase 2 SPA, a likely **significant adverse effect at the international scale**. For the South Pennine Moors SSSI, **the impact constitutes a likely significant adverse effect at the national scale**, due to the permanent removal and modification of notified habitats that underpin the site's designation. (9.9.22 & 9.9.23). For National Trust this is a **fundamental concern** which makes the site unsuitable for any significant infrastructure development in principle.

There is no Collision Risk Modelling available (9.4.23) and the PEIR (9.4.48) has not demonstrated how the mitigation hierarchy has specifically been applied to the siting of turbines, particularly when Appendix 9-1 (figures 10 -24) – shows how sensitive nesting areas overlap and cover the turbine development area. In particular, Curlew nesting sites are widely distributed across the entire site. It appears from this that **the significance of ornithology has not informed the siting of Turbines which is considered unacceptable.** (9.4.49) The spatial overlap between the location of operational infrastructure and key habitats and the availability of alternative habitat within and beyond the SPA/SSSI is considered (9.9.94); but again, this assessment does not consider the **quality, management or long-term viability of adjoining habitat** for displaced species, nor the function and role of other designations such as Local Wildlife Sites in maintaining connectivity between areas (Calderdale Wildlife Habitat Network). This requires **assessment** given the ongoing threat of widespread moorland fires within the SPA and beyond.

The PEIR anticipates residual effects and compensation is expected to include both on-site and off-site measures. Compensation land is not identified and we **are not convinced** that additionality could be demonstrated when the surrounding areas comprise SPA SSSI and are **already** subject to management requirements to reach favourable condition under SSSI legislation.

NT shares the concerns of Yorkshire Wildlife Trust and RSPB that impacts across the designated features of the SPA SAC and SSSI identified at PEIR stage are **unacceptable.**

The Trust emphasises that **harm to nature must be avoided wherever possible, not merely mitigated or offset.** We would expect the scheme to deliver biodiversity outcomes that are measurable and enforceable, with committed long-term monitoring, clear governance arrangements, transparent reporting and independent oversight.

Should the DCO be supported clarity should be provided on how local communities, land managers and conservation bodies will be meaningfully involved in shaping and stewarding the environmental legacy of the scheme. Long-term funding and management arrangements for habitats, green and blue infrastructure must be clearly defined in the ES.

6.0 Hydrology

6.1 General observations

National Policy Statement EN-3 (2.12.65 2.12.66 2.12.67) requires that sites should be configured or selected **to avoid** the need to impact on drainage systems and watercourses.

Where culverting for access is unavoidable, applicants should demonstrate that no reasonable alternatives exist. **This is not demonstrated in the PEIR.**

6.2 Water course sensitivity

Surface watercourse sensitivity classes - medium and low are based on whether or not these are 'designated by the EA under WFD'. It is not clear what this statement means (table 10-17). **All watercourses are covered by WFD.** This includes small un-named waterbodies within the catchment of a larger named waterbody as defined by the EA. WFD waterbodies refer to catchments and are not limited to the trunk channel ('blue line'). The approach taken in the PEIR is an **arbitrary way** of classifying watercourse sensitivity which does not appear to be based on an assessment of the actual hydro morphology and ecology of these watercourses, instead classifying them by their stream order. The cumulative length of the tributary channels in a catchment may far exceed the length of the mapped trunk channel ('blueline'). Activities which impact small un-mapped or un-named watercourses within the catchment can therefore have significant ramifications for the overall water body, its hydrological function and that of surrounding habitats.

Rather than base watercourse sensitivity on this rather arbitrary grouped basis, it would be more appropriate to evaluate their sensitivity on an individual watercourse basis using hydromorphological indicators such as flow persistence (whether or not they are ephemeral), presence of bedrock control, existing land use pressures and the presence of existing modification. A '**River naturalness assessment**' is a useful way of organising this assessment of sensitivity. This would provide a more appropriate resolution of assessment rather than simply discounting watercourses from proper assessment just because they are located within a wider waterbody. It is important to recognise that 'Rivers' (and streams) are a Priority Habitat in England and headwater streams in the northern England generally have a **high degree of naturalness which should be recognised and conserved**. In this context **it is essential that a proper assessment of all small watercourses is undertaken.**

6.3 Hydrology & Hardcastle Crags

We note a hydraulic model is being developed for flood risk for the ES. (10.5.142) which will simulate and quantify fluvial and pluvial flood risk within the Turbine Area including immediately downstream.

Natural Flood Management measures downstream at Hardcastle Crags have included slowing flows through the introduction of leaky dams, attenuation areas woodland management, attenuation ponds etc. (Appx 10-9 Flood Risk Assessment) This is indicative

of attempts in recent years to actively support the management of water in this area to help prevent flood risk.

Given the impact of the proposed development on hydrology and peat, we would expect that a detailed programme of catchment management and natural flood management interventions, including monitoring and analysis to be designed for the site and included in the oEMP.

The ES must also **take full account** of the Hebden Bridge town Flood Alleviation scheme and provide appropriate further mitigation as required.

NT considers that Sensitive Receptors for the assessment of flood risk (PEIR table 10-17) should identify Hardcastle Crag as a receptor of **medium sensitivity** due to the proximity of significant numbers of visiting public throughout the year.

Hydrological changes have the potential to reduce habitat quality, stability and suitability for specialist species which may then pose a risk to the ecological integrity and resilience of the Hardcastle Crag Local Wildlife Site. Baseline water quality monitoring programme is proposed; this should **include Hardcastle Crag**, to support comparative monitoring during construction; to avoid impacts arising to the Local Wildlife Site and for people visiting the river.

The Gibson Mill complex (including cafe, offices and exhibition / event space) is reliant on off-grid electricity provided by a hydroelectric turbine which utilises river water from Hebden Water via historic mill infrastructure, and solar panels. The hydro' scheme is the only supply of electricity to the Mill during the winter months when the solar panels are unviable. Toilets are also flushed using water abstracted from Hebden Water. Gibson Mill complex also has its own spring fed private water supply upon which it is reliant for all drinking water.

Sustainable and predictable water flows and the operational requirements of Gibson Mill must be sustained.

Any hydrology impacts at Hardcastle Crag must be therefore fully considered by the developer and we therefore reserve our position on this matter. National Trust wishes to engage at the pre-application stage on this matter ahead of the ES submission.

7.0 Historic Environment

7.1 National Trust assets & context

The NT interests here lie in Gibson Mill with its associated complex of buildings, woodland and grassland together with our land and properties comprising holiday cottages at Hardcastle Lodge and Widdop Gate Barn and residential tenants at Widdop Gate Cottage, Old High Laithe and New High Laithe. (see non-statutory consultation response).

7.2 Gibson Mill complex & significance

Gibson Mill is a First-generation cotton mill still associated to its complex of ancillary buildings. Showing rapid development of the textile industry in early 19th. The Mill dates from c.1800, which places it at a pivotal point in the history of the textile industry in Yorkshire. The mill complex is an early example of how the factory system developed from the earlier domestic system of clothiers and in order to attract the required workforce, cottages were provided on the site.

In its post-industrial phase the records show the emergence of tourism in Yorkshire in the late Victorian era dating from around the time of trains arriving in Hebden Bridge in the 1840s. The mill complex was converted to an amusement centre and catering establishment. The buildings served as a restaurant, dance hall and roller-skating rink.

The ability to map the importance of tourism through the Victorian/Edwardian eras is relatively rare and this has been perpetuated by donation to the National Trust. The Grade II listing is not a wholly unreasonable basis for suggesting medium value significance, but due to the value of the group as a whole and the fortuitous aesthetic and communal significance identified; **a higher level of significance than medium value should be attributed to the property for the purposes of HIA assessment.**

For the Widdop road properties (group 28) **we broadly agree** that their significance derives largely from their architectural and historic interest as good examples of vernacular farm buildings. Significance also derives from their primary setting which allows the historic interest of the farmsteads to be appreciated through their rural surroundings. We agree the assets together have a **High Heritage Value. However, it is inconsistent** to apportion a medium heritage value to Gibson Mill complex.

7.3 Appendix 13-2 Initial Settings Report

The settings report for the Mill assesses significance as deriving *'significance from their architectural and historical interest as good examples of a water powered textile mill and*

ancillary buildings. Their setting in the wooded valley of the Hebden Water contributes to their significance by emphasizing the use of water power for 19th technology’.

Whilst we agree that water is core to the significance of the site, this is not related solely to the history of the textile mill; but the role that water has played in the history of the site as a significant tourism destination with water activities. Today the property remains an important visitor destination in West Yorkshire attracting some 120,000 visitors per annum to the property (NT car park data) and many thousands beyond this who access the site by walking so any impacts on setting which is defined in the NPPF as *‘the surroundings in which a heritage asset is experienced’* must be **comprehensive** for this complex.

7.4 Initial assessment of Impacts

Verified visualisations **must be provided** from within the mill complex to assess whether turbines would be visible (from the bridge) and the Craggs. The visibility of turning blades would introduce modern elements of movement into the landscape, which would detract from visitors appreciating the significance of the mill buildings in their wooded landscape setting. This would **harm the social communal values** of significance.

The tranquil setting of the Mill may also be altered/harmed if construction noise and disturbance is heard which **requires assessment**.

The Heritage Impact Assessment **must also include** consideration of hydrology and any changes to water flows or quality to the mill ponds and through the complex on the aesthetic, social communal conservation values the place presents.

For Widdop road properties (28) **assessment is required** to consider the construction of turbines, access roads and tracks within the Turbine Area, borrow pits and construction compounds as this will introduce movement, noise and light which may be harmful to residential amenity but also result in a significant change to the agrarian surroundings, which forms an important part of their setting where the impact on significance of these properties is likely to be **harmful**.

8.0 Landscape and Visual

8.1 Overview

The PEIR Landscape and Visual Impact Assessment (LVIA) identifies significant adverse effects on landscape character and visual amenity. The National Trust **agrees** with this conclusion and emphasises that the receiving landscape, designated locally as a Special Landscape Area is highly sensitive due to its openness, elevation, its strong sense of wildness and tranquillity (its perceptual qualities), its cultural significance and recreational value.

The landscape also falls within National Character Area 36: Southern Pennines, which is characterised by: open, elevated moorland plateaux; deeply incised valleys; strong sense of remoteness; and rich historic time depth. Upland moorlands are widely recognised as highly sensitive to large-scale wind development due to their: visual prominence; skyline exposure; limited capacity for screening; and high perceptual value.

The most significant and least mitigable harm arises from effects on the wider recreational landscape. The surrounding moorland, currently largely free from large-scale development, plays **a vital role** in providing **high-quality public access**, contributing to health and wellbeing, and offering a landscape experience valued by local communities and visitors.

There is an absence of vertical infrastructure and whilst windfarms at Ovenden and Coal Clough are visible to west and south- this area provides a refuge from urban development encircling the moors. Walshaw Moor, Hardcastle Crag and surrounding moorland represent significant areas of regionally scarce undisturbed landscapes with a perception of “wildness” which is of particular importance given the relative ease of access from surrounding densely populated and visually “busy” urbanised areas. This makes this area particularly sensitive to change. The introduction of large turbines would **fundamentally harm** this experience.

Sequential verified visualisations need to be provided from within the turbine development area along the Public Rights of Way for the ES to assess and consider the impacts arising for recreational users. **Further work is required** to determine visual impacts associated with the sub-station with verified visualisations.

Where wirelines are currently produced for National Trust properties such as Clough Hole Rd CP and residential properties on Widdop road **verified visualisations should be provided** and similarly for more distant views at Malham Cove.

At Hardcastle Craggs and Gibson Mill; **verified visualisations are required** to determine the visibility of turbines from within the complex (the bridge) and wider estate (the Craggs).

8.2 Landscape Value

Hardcastle Craggs

Hardcastle Craggs is a National Trust property comprising approximately 400 acres of unspoilt woodland and grassland within a deeply incised river valley. Key characteristics include: a secluded and tranquil landscape; dense woodland and limited modern intrusion; high recreational value; and a strong perceptual qualities of remoteness, timelessness and escape.

Gibson Mill

Located within the valley, Gibson Mill is a 19th-century former cotton mill, now operating as an off-grid heritage attraction. The mill contributes significantly to the cultural and historic value of the site and forms a focal point for visitors.

The Recreational Landscape

The surrounding moorland forms an integral part of the visitor experience and includes: open access land; strong connections to the South Pennine landscape through a number of promoted public rights of way and national trails; and a valued recreational resource for local urban communities.

8.3 Landscape Effects

The most significant impacts arise from changes to the wider moorland landscape as visitors experience both the enclosed valley and the surrounding open uplands. The introduction of turbines would alter key views, introduce large-scale vertical structures and reduce perceived remoteness. While some may perceive renewable energy positively, we consider many users are likely to experience landscape urbanisation with loss of natural character and reduced recreational quality. Due to scale and proximity, **these effects cannot be effectively mitigated.**

Hardcastle Craggs

The incised valley limits outward views; however, the LVIA indicates that turbine blade tips may be visible in glimpsed views. It is considered that even limited visibility would **degrade the quality of the visitor experience**, by eroding tranquillity; undermining perceived naturalness; and diminish the sense of historic continuity.

Gibson Mill

The applicant assesses impacts **as minor adverse**. However, **this is not agreed**. It is considered that, from a landscape perspective, the introduction of visible turbine movement would distract from the historic setting; reduce the sense of time depth; and introduce incongruous modern elements. **This effect is likely to be greater than assessed**.

8.4 Cumulative Assessment

The EIA process separates landscape, heritage, recreation and health and wellbeing and access. This risks under-representing the combined and cumulative value of the landscape as a recreational resource. The area functions as a key recreational resource for surrounding urban populations and a landscape that contributes to health and wellbeing; and is a culturally significant upland setting.

The National Trust's position is that **an integrated assessment** is required to inform the ES, including the combined landscape and recreational impacts with health and wellbeing considerations; and economic implications.

8.5 Mitigation & enhancement

Whilst renewable energy development is supported in principle, this does not remove the need to protect highly sensitive landscapes.

Notwithstanding our in-principle concern that the site is not considered a suitable location for windfarm development, should the development proceed the following aspects should be explored by the developer:

A reduction in the visual dominance of the turbines when viewed from open access land and PRow with the siting of fewer turbines.

Reducing turbine height and number in proximity to Hardcastle Crag in the southern part of the development, should turbines prove to be visible from Gibson Mill, the Crag itself, or from National Trust land.

Recreational Measures

Potential measures include:

- Improved active travel routes including access for cycling, adaptive bikes and assistive wheelchairs.
- Enhanced PRow networks, where this doesn't conflict with biodiversity aims.
- Coherent links with existing PRow, access routes and infrastructure, including statutory upgrade of linked routes to bridleways where necessary.

- Statutory upgrade of footpaths on access tracks to bridleways.
- Improved access infrastructure.

NT would welcome an input to any measures put forward. However, it must be acknowledged that such measures **cannot offset landscape-scale harm**.

9.0 Socioeconomics & Tourism

9.1 Methodology

The bespoke methodology for the tourism impact assessment (PEIR 17.8.63) finds no relationship between the development of wind farms and trends in the local or regional tourism economies. It is a **significant concern** that this methodology relies heavily on comparisons with tourism profiles and research from Scottish windfarms.

Impacts on communities/visitors where Turbines are introduced into the sparsely populated landscapes of Scotland is not comparable to Turbines sited on Walshaw Moor which is surrounded by dense concentrations of population. The population density of West Yorkshire is more than 16 times that of Scotland as a whole.

The cultural heritage of West Yorkshire and its distinctive landscape is a significant draw for visitors; nationally and regionally and the area is highly valued by local people who live and work in the densely populated environs. The literary and cultural heritage of this area is international and so significant that there is an active campaign to gain World Heritage Site Status for the Bronte landscape.

A bespoke West Yorkshire methodology must be developed to assess the proposed development having regard to the international, regional and local dimensions of the tourism economy. The assessment to date is not particularly sophisticated, it does not include baseline visitor survey information or visitor information to this area by day/week or longer stays.

For example, PEIR table 17-12 highlights a significant increase in people in the over 65 category in Calderdale of 24.2% projected by 2042 (higher than for UK at 22.6%). **A qualitative and quantitative assessment of impacts according to the age profiles of visitors should be considered.**

NT's analytical data indicates that typically 61% of visitors live within a 0-30 minute drive time of Hardcastle Crag, 20% live within a 30-60 minute drive time with 11% travelling for up to 2 hours. However, visits to the Pennine Way and the Bronte country, Howarth, Hebden

Bridge etc will have their own visitor profile. **Discussions with stakeholders** must be undertaken so that impacts can be properly assessed arising to different components of the visitor economy. **It is essential** to devise a suitable **mitigation and compensation strategy** and a **management plan for visitors** during construction, should the proposal proceed.

9.2 Impacts on recreation

The PEIR considers that the development would not deter the majority of visitors from engaging in active recreation. This conclusion is based on the recreational resources continuing to be available. (PEIR 17.8.81) **We disagree with this conclusion** due to the length of the construction period and the general disruption that this area will encounter for 2 ½ years, or potentially longer. This could deter visitors to the area for a significant period of time. The economic impact of this and how long the area could take to **recover requires assessment and mitigation as required.**

The PEIR states it is not expected that views of the Turbines will fundamentally change the attractiveness of the route to walkers. (PEIR 17.8.84) There is **no tangible evidence** to substantiate this claim. The landscape character and tranquillity of this particular stretch of open and tranquil moorland, uncluttered with vertical infrastructure will be fundamentally altered. Walking through this modified landscape could be significantly less attractive for visitors, There will be the loss in the quality of the **recreational resource, which cannot be mitigated.**

It is noted that increased recreational activity may arise from use of internal access tracks by legal users, including hill walkers, mountain bikers, dog walkers, as well as potential illegal users (such as motocross users) which may result in degradation, disturbance or loss of habitats. (chapter 8). As there is no Access Management Plan available for review **it is not clear** whether access is being enabled or not. Increased recreational disturbance to breeding birds is highlighted as a potential adverse effect of the proposed development (PEIR 9.5.31, 9.9.131 & 9.9.95)

Experience from National Trust sites demonstrates that the construction of permanent access tracks across remote moorland areas changes recreational pressure on these sites. Increased ease of access, whether authorised or not, enables an increase in overall recreational use as well as a shift in the types of activity and duration of visit. In our experience this increases disturbance to nesting birds from people and dogs as well as increasing the risk of other adverse impacts such as wildfire, antisocial behaviour and littering. Expected changes to recreational pressure and associated disturbance are unclear

at this stage and should be robustly addressed by the ES, with **mitigation and management** measures clearly set out in the oEMP including **long-term monitoring, analysis and reporting**.

There is a fine balance between encouraging wider access to the countryside, which National Trust supports, and safeguarding the habitats and special features of the moors. **We agree** further work is required to determine recreational activity and support **further consultation** to confirm activities which pose the greatest risk to agree appropriate approaches to the management of recreational activity. Particularly important will be the need to **manage unauthorised access by vehicles and manage risk of fires on the moors**. It is clear in the **absence of the access strategy** the magnitude of impact arising to recreation routes and loss of open access land cannot be estimated.

The newly launched West Yorkshire Local Visitor Economy Partnership and Destination Management Plan 2025-2028 sets out a clear ambition to grow the £5.77bn visitor Economy ([West Yorkshire Local Visitor Economy Partnership | Visit Calderdale](#)) where walking in Calderdale is promoted as activities for visitors. The ES needs to consider **strategic ambitions** for the area.

At this stage for the reasons identified and the further work required we **disagree with the assessment** that the tourism economy of Calderdale and the wider West Yorkshire region will not experience noticeable adverse impacts.

9.3 Impacts on tourism at Hardcastle Crag

The LVIA (PEIR 12.5.31) notes the National Trust properties within the 45km study area, with the closest being Hardcastle Crag- yet the tourism chapter does not acknowledge that Hardcastle Crag, a significant visitor property, lies close to the proposed development. This **needs to be addressed** and specific impacts which may arise from construction disturbance for visitors, which could deter people from visiting the property, which is also an accredited 'woodland of sanctuary' considered in the ES.

As noted above the destination attracts approximately 120,000 visitors a year who use the car parks to access the site, in addition to thousands who use and value the NT property to access this green space for leisure and recreation.

National Trust would be happy to discuss the tourism profile of Hardcastle Crag and NT properties in the study area with the developer, to ensure they are **properly reflected** within the ES.

10.0 Human Health & Well-Being

The National Trust **agrees** that convincing positive relationships are found between the availability and accessibility of places for exercise and recreation and leisure-time physical activity.strong evidence that physical activity influences mental health and wellbeing, (PEIR 18.8.3).

Walshaw Moor provides a refuge of high quality, tranquil moorland, for the well-being of the urban populations that surround the site. The proposal reduces the quality of this recreational resource. The scarcity of other uncluttered “wild” areas for local people’s well-being in the region should be a key factor when considering the fundamental suitability of this site for infrastructure development of any kind.

This significant change could have direct health and well-being impacts as the sense of peace and tranquillity would be eroded. An assessment of **the intangible qualities** must be included within the ES and effects for health, well-being, tourism and landscape effects **considered in combination.**

The PEIR (18.8.238) argues that as windfarms exist within the landscape, that this is not a novel change which could be significant for public health. **We disagree with this assessment** as this ignores the landscape qualities of this part of Yorkshire (and Special Landscape Area). Whilst existing turbines are visible from the moor to the south and west, Walshaw Moor provides an oasis free from vertical infrastructure, in this aspect it is relatively unique locally. A proliferation of Wind turbines would result in walks dominated by turbines and associated infrastructure. There is a profoundly **more severe impact here due to the degree of visual and physical change that would occur; resulting in the urbanisation of the countryside. Public health impacts cannot be discounted.**

The PEIR concludes interest in Top Withens and the surrounding landscape would continue. The degree and magnitude of change in health-related outcomes is considered to be low. **We disagree**, part of the intangible cultural heritage of the Bronte experience is visiting the wild and undeveloped nature of the moors that have been represented in literary form. This experience would be fundamentally altered by visible turbines on the moors behind Top Withens. **Again this issue has been undervalued.**

The data illustrates that West Yorkshire children are 27.91% less active than in Yorkshire & Humber as a whole and England. In West Yorkshire, 23.05% people aged 16 - 34 are classed as 'inactive' according to Sport England's remit. It is also clear that West Yorkshire has

higher levels of health deprivation compared to Yorkshire& Humber and the rest of England. (Source: Local Insight England Custom Report West Yorkshire March 26. (Oxford Consultants for Social Inclusion Ltd. Page 64 -68) There is the potential therefore for negative direct health impacts to arise from the loss of recreational resource.

Generally, we disagree with the assessment of ‘low impact’ on public health which requires a more refined consideration of behaviours and populations visiting the moors whether for recreation and/or tourism. The developer will be aware there are a significant number of people, action groups and stakeholders against this proposal which provides a clear indication how valued this area is for the communities that surround the site.

11.0 Transport and Access

NT does not propose to comment on the access roads for the development as local communities directly impacted by the proposal are best placed to do so. However, at a general level we are concerned about the significant volume of construction traffic that is identified for narrow roads through local villages.

Our comments relate to the impacts on recreational users of the popular footpath network across the site and impacts for the loss of open access land.

PEIR Table 14-13 concludes there is Negligible, not significant effects on PROW and the Pennine Way arising from fear and intimidation during construction. This is based on mitigations to be proposed in the Outline Construction Traffic Management Plan.

We do not agree when there are **30,800 inbound trips for track material deliveries alone. In total 61,600 journeys** are identified. In addition, there are movements associated with concrete batching and the sub-station’s construction, which lie parallel to the Pennine Way. **We are not convinced** that this can be successfully managed without significant adverse effects for recreational users.

Baseline surveys should be undertaken to determine the level of PROW use - it is a popular regional and national route and the assessment should identify the users of open access land and other informal routes across the moors uses for recreation to **inform the assessment of impacts.**

Outline Construction Man Plan 3.2 (Table 4.1) outlines barred routes for construction. There is no mention of Widdop Road/Ridehaigh Lane, nor the use of the Yorkshire Water access road which joins this road and this route which also follows the Pennine Way. **This needs to be clarified.**

We also seek commitments that roads through Hardcastle Craggs **will not be used** for construction operation, ongoing operation, or maintenance of the development.

12.0 Noise and vibration

Hardcastle Craggs is an area that the urban population escapes to for peace and tranquillity, which has been a destination for visitors for over 150 years. Assurances must be provided that construction noise is not likely to be a concern in this environment which is designated as a Local Wildlife Site and designated Open Space, Sport and Recreation Facility (Calderdale Local Plan Policies GN3 & GN6) and a City of Sanctuary accredited '**Woodland of Sanctuary**'.

Specifically; whilst we note noise monitoring locations have been selected for residential receptors there appear no measuring locations for recreational users on the Pennine Way. (Appendix 15-2) **This should be addressed. In addition, it is not clear how noise impacts in respect of ecological species will be assessed within the ES.**

13.0 Accident risks

We support the recognition of risks to fires and habitats in chapter 13; particularly given recent National Trust experience managing fires on moorlands such as Marsden. We would strongly encourage the developer to establish robust wildfire management plans and response plans (in line with DEFRA best practice guidance) for the site during the construction and operational phases with input Walshaw Moor's Gamekeepers and West Yorkshire Fire and Rescue, and regular reviews. Additionally, we would encourage the developer to ensure they have representation on relevant regional Fire Operations Groups (FOGs) e.g. the South Pennine FOG. With suitable funding provided.

This chapter should also cover anti-social behaviour and management of unauthorised access arising from quad bikes/motorbikes etc on tracks and management of accident risks during operation phase. It is a **concern** that the access management plan has not been published at PEIR stage.

14.0 Cumulative Effects

At this stage the PEIR reports cumulative effects cannot be ruled out relating to most areas of the project. As technical assessments for the ES have yet to be completed it is difficult to provide a fully informed response.

Clarity is needed around how the cumulative assessment for completed projects for the inter-project assessment is undertaken (PEIR 24.1.1). It is stated that developments already constructed and operating are already accounted for in baseline conditions, but as technical assessments tend to be undertaken on a chapter-by-chapter basis, this risks missing or potentially under reporting combined effects of different impacts and their interactions on sensitive receptors.

14.1 SPA disturbance & displacement

The SPA is under many pressures. This area of the moor is of critical importance for breeding Golden Plover and Curlew. The developer needs to consider cumulative impact of disturbance from construction and operation of the CEP and on other areas of the SPA if species are displaced. Other pressures across the SPA should be considered and their cumulative impact assessed, for example increased recreational access and associated disturbance, land use change and habitat loss, and the loss of habitat through widespread wildfires - birds can't simply move to other areas. An assumption that the rest of the SPA will provide the same availability and quality of habitat and simply “soak up” birds displaced by the development is not founded in reality. It is therefore essential that the **cumulative impact of the development (on disturbance and availability of habitat throughout construction and operational phases) and other pressures across the SPA are assessed in combination.**

14.2 landscape, heritage, recreation, health, wellbeing & access

The EIA process separates landscape, heritage, recreation and health and wellbeing and access. This risks underrepresenting the combined and cumulative value of the landscape as a recreational resource.

The quality of the environment for mental health is important, and the impacts associated with major visual change needs to be considered for the interrelated effects on tourism, visitor health and recreation as this could give rise to greater significance once landscape and other construction project impacts are considered (e.g. noise).

The impacts of more than one development may affect people simultaneously, so the applicant needs to consider the **cumulative impact on health** arising from the impact from increasing the prevalence of Turbines in this area. For the Bronte country visual impact concerns were raised when Ovenden wind farm was proposed and there may be **cumulative impacts** to assess arising from combination of turbines in the landscape.

14.3 Cumulative assessment for Hardcastle Crag

A cumulative assessment for Hardcastle Crag property across heritage, hydrology landscape & Visual and tourism & health impacts **is required**.

15.0 Conclusion

NT wishes to engage with the developer during the pre-application stage to discuss issues impacting Hardcastle Crag, such that we can scope out the extent of formal representations in response to the DCO application.

In summary, the National Trust's position is an objection to this proposal on the basis that impacts on deep peat have not been avoided (in accordance with national policy) and there are unacceptable impacts identified for irreplaceable habitats and species. We are not confident that there can be any suitable mitigation or compensation delivered to offset the harm that would be caused to these key interests.

The priority for this site should be its invaluable contribution it provides for nature and people in the South Pennines and other locations with fewer environmental constraints should be prioritised for wind energy.

Notwithstanding this, should the application proceed we have highlighted that opportunities should be taken to reduce turbine numbers and their impacts in the most sensitive areas.

The opportunity should be taken for further consultation with communities and stakeholders ahead of the DCO submission.