



Community Rights Of Way Service

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Date..?th April 2024.

Chief Planning Officer,
Calderdale Council,
Planning Services,
Town Hall,
Crossley Street,
Halifax HX1 1UJ

FAO Richard Riggs

Dear Mr Riggs,

EIA Scoping application received by Calderdale Council on 25 September 2023 (reference 23/06010/EIA),

Location: Walshaw Moor Estate, Widdop Road, Heptonstall, Hebden Bridge

CROWS (Community Rights of Way Services) should have been a Consultee on the Scoping Report of the above proposed development, and we are therefore writing this as an official Consultee response. Please keep this letter on file in relation to any future planning applications on the Walshaw Moor Estate and keep us informed of any further developments regarding this project.

Our organisation

We are a voluntary organisation, and registered charity (reg. charity no. 1201645), with the following remit:

- to maintain and repair the Rights of Way and permissive path network in the Upper Calder and Ryburn Valleys for the benefit of both the local community and visitors, including walkers, horse riders, runners, mountain bikers and other users.

- to report to the Local Authority on the condition of the Rights of Way network.
- to undertake other projects provided they are for the benefit of the community.

We are writing to raise serious concerns about aspects of the proposed development in relation to public access to and enjoyment of Walshaw Moor and its surroundings, both during the construction phase, and thereafter over the 25-30 years of its operation and subsequent decommissioning.

We have consulted and are liaising with Natural England, the custodian of The Pennine Way, and the Rights of Way section of Calderdale Council Highways Department.

Footpaths

There are several Public Rights of Way that cross the proposed site, including The Pennine Way, a National Trail. There are also many well used permissive and access paths across the moor which is designated as Open Access. One corner of the site is Common Land.

Surrounding the proposed site there are networks of well-used Rights of Way and other paths, for example, on Heptonstall Moor, in Hardcastle Crags (National Trust), Blake Dean, Crimsworth Dean, on Turn Hill, Flaigh Hill, and in the surrounding areas of Haworth and Stanbury, Oxenhope, Worsthorpe, Pendle and Trawden. These all have views of Walshaw Moor and provide walking access to it.

The valley and moorland path network of the Upper Valley is a key area of the visitor economy. The paths are also, of course, a resource for the health and recreation of the local community in Calderdale. The proposal would damage, alter or effectively remove the paths on Walshaw Moor from this network, which will have an adverse impact.

Our main concerns to the proposal set out in the Scoping Report are as follows.

- **Damage to and potential loss of footpaths.** The transportation and installation of so many huge turbines and the associated excavation for the construction of their footprints and access roads cannot fail to obstruct, damage or obliterate many paths on Walshaw Moor. The Scoping Report does not discuss the impact of the proposed development on footpaths.
- **Access.** During construction there will inevitably be serious (or even total) restriction of access. Afterwards footpaths, if they still exist, will have been radically affected. As examples, a series of turbines is proposed from Warcock Hill Side and Dove Stones to Grey Stone Hill and along Great Edge and The Scout, exactly along the existing Open Access paths there. T27 is sited on a permissive path and a number of other turbines are very close to the Pennine Way and other Rights of Way. Walking on the Moor is likely to become a walk on newly built roads through a “forest” of enormous turbines.
- **Reinstatement of footpaths** after the construction. The Scoping Report does not mention this at all. This is a matter of great concern as we understand from the

experiences of other wind farm developments locally and further afield that the required reinstatement of footpaths is often ignored or very poorly done..

The Scoping Report

We could only find two, rather oblique, references to the matters we are concerned about. Section 13 of the Scoping Report refers to a standalone assessment and report on socio-economics, tourism and recreation, to include *“potential impact on the community and wellbeing associated with the Proposed Development”*, but there is no elaboration in relation to walkers and other path-users.

The Report does not mention arrangements for access during the (likely long) period of construction, or whether existing footpaths will be reinstated. FAQ. 20 on the Developer’s website asks : *“Will people still be able to access Walshaw Moor?”* with the answer: *“ Yes. Once Calderdale Wind Farm is operational the moorland will be open to the general public to enjoy”*. This is extremely vague. It takes no account of the dramatic alteration to the physical landscape of the Moor and the access to it which will be inevitable consequences of the proposed wind farm.

Thank you for your attention in reading this.

Yours sincerely,