

23 October 2025

To Members of the Council

Dear Sir/Madam

You are hereby summoned to a meeting of the
LOCAL ENVIRONMENT & CLIMATE COMMITTEE
(Cllrs: Woodhead, Boggis, Guilfoyle, Harvey, Hoyle, Macdonald & Morse)
which will be held in the Greenwood Room in Hebden Bridge Town Hall on
WEDNESDAY 29 NOVEMBER 2025 at 7:30pm



Emma Green
Clerk to the Council

This meeting is open to the public unless Members decide to exclude the public for any exempt or confidential item of business.

AGENDA

1. **TO RECEIVE APOLOGIES FOR ABSENCE AND ANY SUBSTITUTIONS.**
2. **TO RECEIVE MEMBERS' INTERESTS RELATING TO AGENDA ITEMS FOR THIS MEETING.**
3. **MINUTES OF THE MEETING HELD 23 SEPTEMBER 2025**
To report on matters arising from the minutes of meeting held 23 SEPTEMBER 2025 not itemised on this agenda. (enc).
4. **COMMUNICATIONS**
To receive communications and decide on appropriate actions.
 - a) Ban the Burn response to Calderdale Energy Park Scoping Report - Summary September 2025 (enc).
 - b) Ban the Burn Petition email (enc).
5. **BUDGET UPDATE**
To receive the updated budget for the current year and decide on actions as appropriate (enc) also to consider budget request for forthcoming period 2026-27.
6. **PROPOSED PURCHASES**
To consider the purchase of equipment to support the safe and effective delivery of local environment projects and events.
7. **CALDERDALE ENERGY PARK**
To receive an update on the HRTC Windfarm survey results, next steps, and to decide on appropriate actions.

8. HIGH HIRST WOODMEADOW

To receive an update on the following projects and decide on appropriate actions:

- a) High Hirst Woodmeadow Activities and Events Report (enc).
- b) Enmesh Donation
- c) Full Of Joy Animal Sanctuary Visit
- d) High Hirst Bat Walk 2025
- e) High Hirst Hay at Malham Show 2025

9. ALLOTMENTS

To receive an update on the following projects and decide on appropriate actions:

- a) High Hirst Allotment Tree Works Report (enc).
- b) Banksfield and High Hirst Allotment Quarterly Workday Plan (enc).
- c) Tenancy Agreement update and invoicing 2025/26

10. OTHER PROJECTS & UPDATES

To receive an update on the following:

- a). Hanging Basket projects 2025 costings breakdown
- b). Green Hub, in partnership with Projects & Events
- c). CROWS Funding Proposal Report (enc).

11. EXCLUSION OF THE PRESS AND PUBLIC

To resolve to exclude members of the public and press under the Public Bodies (Admissions to Meetings) Act 1960 during consideration of items of a confidential nature.

HEBDEN ROYD TOWN COUNCIL

Meeting of the LOCAL ENVIRONMENT AND CLIMATE COMMITTEE Held TUESDAY, 23 SEPTEMBER 2025

MINUTES

PRESENT: Councillors: Woodhead (Chair), Harvey and Macdonald.

Deputy Clerk: Ebony Andrews

216. TO RECEIVE APOLOGIES FOR ABSENCE AND ANY SUBSTITUTIONS.

Apologies were received from Cllrs. Hoyle and Morse.

217. TO RECEIVE MEMBERS' INTERESTS RELATING TO AGENDA ITEMS FOR THIS MEETING.

There were no members interests reported at this meeting.

218. MINUTES OF THE MEETING HELD 5 AUGUST 2025

RESOLVED: There were no matters arising.

219. CALDERDALE ENERGY PARK (CEP)

The Deputy Clerk presented information on HRTC's current CEP survey (open until 13th October). The survey has attracted over 700 responses to date and currently shows strong opposition to the windfarm proposal (over 90% against). It was agreed that this strength of feeling provides a strong basis for the Committee to comment on the EIA Scoping Opinion, as per min. 206.

RESOLVED: The Committee will produce a comment to be shared with the Planning Inspectorate to inform the Environment Impact Assessment Scoping Opinion on CEP. The deadline for the response being Monday 29th September.

220. EXCLUSION OF THE PRESS AND PUBLIC

There was no motion to exclude members of the public and press under the Public Bodies (Admissions to Meetings) Act 1960 during consideration of items of a confidential nature.

The meeting finished at 6:40pm.

These are summaries of Ban the Burn and Upper Calderdale Wildlife Responses to Calderdale Energy Park Scoping Report, Chapters 1-9

Chapter 1

In addition to this Chapter, together with Upper Calderdale Wildlife Network we have responded in detail to Chapters 2-9 of the Calderdale Energy Park Scoping Report.

Our core response is that the Scoping Report is fundamentally flawed and fails in its statutory purpose, as defined by relevant sections of the EIA Regulations 2017.

These are the key points that have led us to this view.

1. Lack of Independence and Objectivity

We believe the Scoping Report is not the unbiased, objective document it should be. For example, Chapter 2 presents a selective overview of national energy policy. It heavily emphasises the presumption of consent for Critical National Priority infrastructure projects while omitting crucial policies that qualify or override this presumption on environmental grounds.

We believe the impression this creates, of a misleadingly favourable policy context for a big onshore wind farm development on internationally protected peatland, appears to pre-judge the outcome of the vital Habitats Regulations Assessment.

This bias is compounded by a consistent underrepresentation throughout the Scoping Report of the extent of the protected blanket bog habitat on Walshaw Moor, which skews the entire environmental impact assessment.

2. Misuse of the 'Rochdale Envelope' approach to environmental impact assessment

The Scoping Report admits the Proposed Development is almost entirely indicative and uncertain. (Para 13.6.18). This level of vagueness seems to make a proper assessment of environmental impacts impossible and undermines the Scoping Opinion's purpose (which is to provide a description of the Proposed Development which is sufficient to enable the main environmental effects of the scheme to be properly assessed.)

The Scoping Report uses the 'Rochdale Envelope' approach for dealing with uncertainty about the Proposed Development, but we think it is misusing the approach as an opportunity to allow for insufficient detail in the environmental assessment - despite the Planning Inspectorate's warning in its online Advice Note 9 not to do this.

If the Scoping Opinion allows this to continue, the Proposed Development is likely to undermine environmental protections for Walshaw Moor and the surrounding areas

However, as far as we know, if Calderdale Energy Park wants this kind of flexibility about the Proposed Development, initial design parameters for the Proposed Development have

to be properly assessed and taken into account in the pre-application stage. We think this means the Applicant has to produce preferred options for most elements of the Proposed Development by January 2026 - the scheduled date for the Preliminary Environmental Information Report and statutory public consultation. This seems unrealistic and unsafe,

3. Inadequate Approach to Environmental Impact Assessment

Compounding the misuse of the Rochdale Envelope Approach, the Scoping Report reveals critical deficiencies in proposed environmental assessments.

Inaccurate descriptions of moorland habitats consistently overemphasise dry heath and underrepresent the extent of priority protected blanket bog. The Scoping Report doesn't seem to have a grasp of blanket bog restoration measures. It makes only the barest mention of blanket bog restoration as an existing part of Wlshaw Moor's status as an SSSI/ SAC, or of the Wlshaw Moor Estate 2017-2042 Catchment Restoration Plan.

Proposed additional mitigation, restoration, and compensation measures are vague, misconceived, and demonstrate a lack of understanding of peatland ecology.

Despite claims in Table 7.11 that their approach now meets Natural England's expectations, the technical chapters reveal errors and omissions. For example, a back-to-front approach to environmental assessment is stated in Chapter 7, where habitat surveys for off site cable corridors and access routes are scheduled **after** preferred routes have been chosen. This suggests these surveys are a token gesture and we are highly critical of this topsy-turvy process.

4. Flawed representation of the Habitats Regulations Assessment

We can't imagine that the bias shown in Chapter 2 will help with the decision making process for Calderdale Energy Park's DCO application, Environmental Statement and the Shadow HRA that the Applicant intends to submit.

The real policy context for a large wind farm on protected peatland is conflicted, attempting to balance climate goals with binding international commitments to restore nature (the Kunming-Montreal Treaty) and the government's drive for economic growth.

In presenting a self-serving version of the policy context, the Scoping Report obscures crucial exceptions to the presumption of consent for Critical National Priority infrastructure projects, such as when mitigation of adverse impacts still leaves residual impacts that present an unacceptable flood risk or risk to irreplaceable habitats. Both are of direct relevance here.

The report fails to even mention the Hebden Bridge Flood Area, which already suffers severe flooding that is worsened by Wlshaw Moor Estate's mismanagement. It is disturbing that HRA issues, including potential derogation, are clouded by this pro-development bias and a disregard for policies that provide additional protections for

peatland. We are deeply concerned that the restoration of this precious landscape could be entrusted to people who appear not to grasp its importance.

5. Socio-Economics and a Lack of Corporate Transparency

There is a lack of transparency in the Scoping Report's cursory information about the applicant, Calderdale Wind Farm Ltd, and the "sponsorship" provided by Next Gen Infra, a subsidiary of Al Gihaz Holding.

Although we are not aware of any legislative or regulatory requirement for this, we contend that the public has a right to know more about who will be the ultimate owner and custodian of this internationally significant protected site, and accountable to Natural England and Defra.

Transparency is in also the public interest regarding:

- Corporate responsibility for potentially significant adverse impacts on water quality and flood risk.
- Who would pay for off-site biodiversity compensation.
- Who would manage the Community Benefit Fund.

So we would appreciate it if some corporate due diligence could be scoped into the socio-economics assessment.

6. Conclusion

In short we find the Scoping Report is biased, vague, and unsafe. It fails to provide a robust or objective basis for the many decisions that need to be made about the Proposed Development in a short timeframe during the pre-application stage. Let alone the Environmental Statement and crucial Habitats Regulations Assessment. We call upon the Planning Inspectorate to sort out these problems in its Scoping Opinion.

Chapter 2 Planning and Policy Context

Our response focuses on the Scoping Report's biased and incomplete overview of National Policy Statements for renewable energy. We believe this creates a misleadingly favourable policy context for the Proposed Development on internationally protected peatland.

The report's selective presentation of policies heavily emphasises the presumption of consent for Critical National Priority infrastructure projects while omitting crucial policies that qualify or override this presumption on environmental grounds. Key omissions that seriously undermine the report's objectivity include:

Exceptions to the presumption of consent: – such as when mitigation of “adverse impacts” from a big renewable energy project still leaves a “residual impact”, and this presents an unacceptable flood risk or risk to irreplaceable habitats. (EN-1, 4.2.15) We are shocked at this omission. The Scoping Report's missing information is crucial for the Hebden Bridge Flood Area. It already experiences severe flooding that is worsened by mismanagement of Walshaw Moor Estate. The Scoping Report doesn't even mention the Flood Area.

Additional 2025 peatland protections for designated peatlands as sites for wind farms, such as requiring applicants to seek and rule out other locations first.

Requirements for clarity and scientific evidence in big onshore wind farm planning applications, which should be clear and assessable and make “appropriate and extensive use” of the best scientific evidence (Draft EN-3, 2.12.148).

Selective quotation from a policy statement that omits the crucial sentence stating that designation of a protected site “may make consent for such construction more difficult to secure.”

These omissions seem self-serving, designed to downplay the significant policy hurdles CEP faces, particularly concerning the Habitats Regulations Assessment.

Relatedly, we challenge the policy direction to follow NatureScot guidance on siting infrastructure on shallower peat. We contend this guidance is flawed and not supported by peat science literature, citing the IUCN UK Peatland Programme, which states that shallow peat is a significant carbon store and often ecologically vital, and it is more appropriate to site big windfarms on mineral soils. We reject the Scoping Report's depth-based definition of peat (>0.3m) as scientifically inadequate and inappropriate for conservation purposes.

Finally, we highlight the omission of a policy requiring the Secretary of State to consider if adverse effects on site integrity are temporary or reversible (Draft EN-3, 2.12.150). Given

that peatland damage from drainage is effectively irreversible over meaningful timescales (potentially centuries), this is a critical consideration for a 35-year project. We stress that

Ban the Burn response to Calderdale Energy Park Scoping Report-Summary, September 2025

the "best scientific evidence" must be a material consideration and that all monitoring data from wind farms on peat should be made public for peer review.

In summary, we believe Chapter 2 presents a garbled and biased policy overview that prejudices the outcome of the application and fails to provide the objective, comprehensive information required for a proper assessment.

Chapter 3 Approach to Environmental Impact Assessment

We question the feasibility of the Scoping Report's Approach to Environmental Impact Assessment, because of the high level of uncertainty surrounding the Calderdale Energy Park Proposed Development.

It seems impossible for Calderdale Energy Park to comply with Schedule 4 of the EIA Regulations 2017. This requires the description of the Proposed Development to be sufficient to enable the main effects of the scheme to be properly assessed. But key elements—turbine layout, tracks, cable routes, grid connection, substation and BESS locations, and restoration and possible compensation measures for blanket bog and other peatland habitats—are all still only indicative.

There are fine words about complying with the regulatory requirements for environmental impact assessment of the Proposed Development, but little about what that means in practice. And where there is specific Habitat survey information in the Biodiversity Chapter, it says these surveys of the Cable Corridor and Site Access Search Areas will be completed **after** identification of the preferred options. We are highly critical of this back-to-front approach.

The Scoping Report plans to use the 'Rochdale Envelope' approach for dealing with uncertainty about the Proposed Development, but we think it is misusing the approach as an opportunity to allow for insufficient detail in the environmental assessment - despite the Planning Inspectorate's warning in its online Advice Note 9 not to do this.

the 'Rochdale Envelope' approach requires the DCO application and Environmental Statement to contain details of the outline Design Parameters for the Proposed Development. Even though currently no such parameters exist, Chapter 3 says the Applicant will have these details by next summer, when they plan to submit the DCO application .

But as far as we know, if Calderdale Energy Park wants this kind of flexibility about the Proposed Development, initial design parameters of the Proposed Development have to be properly assessed and taken into account in the pre-application stage.

The timeline allows only three and a half months to develop these parameters. January 2026 is the scheduled date for the Preliminary Environmental Information Report and statutory public consultation. This seems unrealistic and unsafe, given the inadequate and questionable baseline surveys for habitats, hydrology and peat.

We don't know what to make of a mention that the Planning and Infrastructure Bill could upset the statutory consultation appplecart, and that Calderdale Energy park will follow the latest requirements.

Finally, Chapter 3 completely ignores the Ecosystem Approach for assessing impacts on a complex peatland system. This approach, endorsed by the Convention on Biological

Diversity, requires an understanding of hydrological and ecological connections across the entire peatland area. Instead, the Scoping Report focusses on isolated aspects of the peatland, and fails to link across the different technical chapters. The result is a failure to understand how the Proposed Development's likely significant adverse impacts on the SAC/SSSI and SPA extend far beyond the infrastructure footprint, because of the complex hydrological and ecological connections across the whole mosaic of interrelated peatland habitats.

In short, we believe the EIA approach in Chapter 3 cannot be carried out lawfully according to the 2017 EIA regulations, as long as the apparent misuse of the Rochdale Envelope approach continues as a pretext for insufficient detail in the environmental assessment.

Chapter 4 - Scoping Boundary and the Surrounding Area

The Scoping Report in general, and Chapter 4 in particular, give us no reason to change our response to the first Calderdale Windfarm Scoping Report in September 2023, that Walshaw Moor Estate is an inappropriate place for a big windfarm. The rebrand of Calderdale Energy Park since then has done nothing to alter our view.

These are our reasons.

1. There is a better alternative

We think landscape scale blanket bog restoration is a better way of achieving the net zero carbon, biodiversity, flood management and local economy aims that Calderdale Wind Farm developers claim their £500m scheme would deliver – while unaccountably proposing to build it on internationally important, highly protected blanket bog and other peatland habitats.

We are at a loss as to why the Applicant thinks it is a good idea to put a windfarm on the most highly environmentally protected land in the country, when both the non-statutory consultation and the current Scoping Report fail to demonstrate convincing climate or nature reasons for it.

We oppose placing a wind farm on the South Pennine Moors SAC, SPA, and SSSI - the most highly environmentally protected land in the country. The site is a vital carbon sink of national importance, with at least 50% of the Turbine Area comprising blanket bog, according to the project's questionable UK Hab survey. We are confident that the area is more than that, as much of what the Scoping Report classifies as dry heath is degraded blanket bog.

The Scoping Report fails to provide convincing climate or nature-based justifications for this location, leading us to question if the motive is simply profit. This would not bode well for the future of this protected moor.

2. Inaccurate Baseline Information and Too-Tight Timeframes

We are not reassured by the promise of “extensive survey effort and assessment through both EIA and HRA approaches.” This chapter alone contains basic errors; paragraph 4.3.2 misdescribes the habitat, contradicting the Biodiversity Chapter.

We have detailed in our response to Chapter 3 why it seems unlikely that the Applicant will meet a January 2026 deadline for producing preferred design parameters for the Proposed Development, that will enable the main effects of the scheme to be properly

assessed. But that is the schedule for the statutory consultation and the Preliminary Environmental Information Report.

3. Failure to Address Past Concerns

In 2023, Scoping Report errors and omissions serve to obscure the unsuitability of the site. The 2025 Scoping Report has not satisfactorily addressed the serious errors and omissions we identified in the 2023 report.

Our response to Chapters 7, 8 and 9 points out that none of these and other issues that we raised back in 2023 has been resolved in the 2025 scoping report. These issues included:

- An incorrect definition of deep peat.
- Failure to consider the implications of Natural England's removal of a proposed track from the measures in the 2017-2042 Walshaw Moor Estate Catchment Restoration Plan, after interpolated "shallow peat" depth measurements along the proposed track turned out to be deep peat, once probed in real life by a member of the public.
- Proposed use the Scottish Government Carbon Calculator for Wind Farms on Peat (2023 Scoping Report, 15.1.2), while ignoring experts's calls for an urgent review of the calculator's continued applicability because of developments in the science of peatland management and significant drops in emissions factors for electricity generation.

4. The Newly Emerged Aggregate Problem

Walshaw Moor looks even more inappropriate now. Since the 2023 Scoping Report, some simple citizen desktop study (which the project team should have done for itself) has shown that the proposal to source aggregate from onsite borrow pits is unrealistic, and that there would be quite extreme likely adverse environmental and transport impacts of importing the necessary aggregate onto the site. There is more about this in our response to Chapter 5.

5. Expansion of the Project's Spatial Extent

The project's spatial extent has grown to include Cable Corridor and Site Access Search Areas, threatening further damage to the protected SAC and SPA which includes some of these areas. We are extremely worried about the proposed North West access track, carrying constant aggregate traffic as well as heavy mobile cranes and hundreds of Abnormal Indivisible Loads.

The current Scoping Report fails to rectify past flaws and introduces new, significant concerns. We continue to campaign, as part of a wider Peatland Alliance, for a legislative

ban on wind farms on protected peatlands. The Walshaw Moor Estate and its surrounding areas remain completely unsuitable for the Proposed Development.

Chapter 5 The Proposed Development

Chapter 5 is inadequate for its purpose. According to (**para 1.4.6, Table 1-1**) this is to explain “the likely significant environmental effects of the Proposed Development on the environment” [sic]. But It doesn’t do this.

Key points are:

1. All elements of the Proposed Development are still only indicative, 3 months on from the non-statutory consultation.
2. It is unclear what the process is for coming up with preferred options for all elements of the Proposed Development between now and January 2026. Both the Preliminary Environmental Information Report and the statutory consultation are due then.
3. The Scoping Report seems to be exploiting the Rochdale Envelope approach to environmental impact assessment, which is intended to permit an application to be made when it includes **uncertain details** about the Proposed Development. **But the whole Proposed Development is uncertain** at the moment. It looks as if the Scoping Report is taking advantage of the Rochdale Envelope approach as “a blanket opportunity to allow for insufficient detail in the environmental assessment” - despite the Planning Inspectorate’s warning in its online Advice Note 9 not to do this.
4. Because the Proposed Development is almost entirely indicative, we can’t see how the Scoping Opinion can fulfill its task of requiring the Proposed Development to remain materially the same when the Applicant submits the Environmental Statement and the DCO application. So we think the Scoping Opinion will have to require the production of preferred options for the various elements of the Proposed Development by January 2026.
5. The Scoping Report consistently under-represents the extent of blanket bog on Walshaw Moor. This skews the assessment of environmental impacts.. Additional blanket bog restoration is intended to be a key part of the Proposed Development. But mitigation and restoration measures in Chapter 5 are vague, misconceived, and lack understanding of peatland ecology.
6. The Proposed Development is stymied by lack of local knowledge and failure to carry out basic desktop studies of engineering and practical realities on Walshaw Moor and offsite areas. Chapter 5 makes an unrealistic claim about sourcing suitable aggregate from onsite borrow pits which would have been resolved by a quick desktop study. As it is, Chapter 5 fails to address the massive logistical and environmental impacts of importing the aggregate into the site. These and potential health impacts need to be scoped in.

7. Other areas of ignorance about major engineering constraints presented by the moor include evident carelessness about the instability of the peat and impossibly steep gradients in the NW search area for an access road for Abnormal Indivisible Loads and crane lorries.
8. Related Scoping Report Chapters show that key Walshaw Moor baseline surveys were not done properly or even at all, particularly peat depth, habitats and hydrology surveys. The environmental consequences are not good, particularly for the moor's hydrology and increased flood risk in the Hebden Bridge Flood Area. There is an inadequate plan for subsequent environmental surveys to offsite areas.
9. For these reasons, the Proposed Development is shown to be potentially environmentally destructive and dangerous.

Chapter 6 response is by Upper Calderdale Wildlife Network - this is a summary

Chapter 6 - Ornithology

1. Belittling Environmental Impacts, Lack of Objectivity

The report's independence is compromised by statements that pre-judge the conclusion of other reports and significantly understate the project's scale and impacts. Saying a 41-turbine wind farm on 2352ha of protected peatland has "low potential for significant habitat loss" shows a lack of understanding of the scale of the Proposed Development and its construction. Similarly, when Golden Plover is explicitly cited in the SPA, stating that they "may" use the area during "key" periods is disingenuous. We also object that the term 'ornithological features' is unnecessarily obtuse and commodifies nature. We request plain English be used.

2. Inadequate Baseline Data and Survey Methodology

The Scoping Report persistently underplays the extent and importance of blanket bog, although this is the priority habitat in the SAC and vital for the birds that live on the moor.

The habitat map is inaccurate, classifying large areas of degraded blanket bog as upland heath. This is contradicted by Magic Map, DEFRA's Priority Habitats map, and the JNCC's citation about the SAC, which confirms all blanket bog is an Annex I habitat. This misclassification undermines the entire environmental impact assessment of the Proposed Development on the protected site.

The species list is incomplete, omitting known breeding birds like Short-eared Owl, Long-eared Owl, and Merlin—a key SPA species. Other omitted species include Greylag and Pink-footed Geese, and several waders. Target species are not named in section 6.3.16.

The chapter fails to integrate impacts on birds with impacts on their peatland habitats, although they are inseparable. Critically, the proposed surveys are insufficient:

- * Winter raptor surveys and the establishment of control monitoring sites, as requested by us and the RSPB, are omitted. Land access cannot be a valid excuse given Walshaw Moor Estate's ownership of comparable surrounding land.
- * Survey areas do not include proposed access roads and cable corridors, despite National Policy requiring early routing consideration. The timetable risks making this survey work redundant.
- * Surveys for high-altitude passage birds, like the red-listed Swift, are mis-timed (March/

October vs. May/August), and the specific threat of turbine-infrasound is ignored.

* The impacts of artificial lighting on migration and breeding birds are not considered.

In addition the survey-design process seems to be back to front in terms of the design of the turbine area. Para 6.4 4 states that the design of the turbine area has been adapted to minimise impacts. But the design of the proposed development should take account of survey work yet to be completed, so we would expect the survey work to inform the design and turbine layout. If this is not the case, there seems little point in carrying out these surveys.

This back-to-front process has been noted in habitat surveys too, in Upper Calderdale Wildlife Network's response to Chapter 7. Ban the Burn's response to Chapter 3 notes it as a systemic problem with the Applicant's approach to EIA.

3. Lip Service about Construction and Blanket Bog Mitigation/Restoration

The construction proposals are vague and inadequate:

- Avoiding only the peak nesting season (April-May) is not enough - as the breeding season extends from February to July. The phrase "wherever practicable" provides a worrying loophole.
- Proposals to use handheld equipment seem like a cut and paste from somewhere else - how can you build a massive windfarm with hand held tools? Avoiding artificial lighting "wherever practicable" requires an explanation.
- There is no commitment to off-site waste disposal.
- Proposed restoration has been a major justification for the acceptability of the project on this highly protected blanket bog. But there is no mention of habitat restoration during the windfarm's operation, and no clarity about any environmental measures and mitigation during construction to help avoid or reduce the potential for significant adverse effects.

5. Scoping Out Effects of the Proposed Development

We strongly disagree with scoping out all non-target species. Buzzard, Kestrel, Whinchat and other non-target bird species that should be "common and widespread" are not necessarily so and the Proposed Development's effects on them need to be assessed.

The impact of the fenced Battery Energy Storage System (BESS) compound on habitat fragmentation must also be assessed.

6. Conclusion

We hope these flaws will be remedied in the Planning Inspectorate's Scoping Opinion and that statutory consultees will support this.

Chapter 7 (Biodiversity)

1. Generally

A major concern across a number of Scoping Report Chapters - including this- is the inaccuracy of the description of the moorland habitats, under-representing blanket bog and over-emphasising areas of dry heath. This is the case in this chapter.

Using the best scientific evidence is a material planning consideration (2025 EN-3 Draft National Policy Statement) but this seems to be disregarded often.

There is a failure to cross reference information between this chapter, the previous chapter on ornithology, the chapter on peat hydrology and the chapter on carbon and climate. But these aspects of the moor are all fundamentally linked and need to be thought of as such in order to understand the environmental impacts of the Proposed Development.

2. Policy and legislative context omissions

This section of Chapter 6 omits some key policy documents:

- The UK Biodiversity Framework 2024,
- The Kunming-Montreal Global Biodiversity Framework,
- Defra's Irreplaceable Habitats Policy, and
- Natural England's new Definitions of Favourable Conservation Status for blanket bog and heathland.

3. Surveys and Baseline Conditions

Survey flaws and a back-to-front approach to the relationship between environmental surveys and design of the Proposed Development are evident in this Chapter. This problem is also highlighted in other Chapter summaries (1,3,6) so is not repeated here.

Apart from to say that while Chapter 7 has corrected the error in the seriously misleading Walshaw Moor Estate UK Habitats survey map, that was used in the non-statutory consultation Brochure, and now records approximately 50% of the turbine area as blanket bog (a significant correction from next to nothing), we are fairly confident that large areas that are described as dry heath are in fact probably degraded blanket bog.

4. Blanket bog restoration and monitoring

As with all the other chapters that mention it, the Biodiversity chapter's references to blanket bog restoration are muddled, confusing, and vague. There are no proposed restoration measures - a feature of the entire design process for the Proposed Development which Chapters 3 and 5 particularly address. A key uncertainty seems to be around the idea of using restoration to enhance the Walshaw Moor habitat as part of the Proposed Development, and Natural England's stated position that restoring SAC habitats to favourable condition, and the Walshaw Moor Restoration Plan, are existing obligations, and any restoration measures carried out as part of the proposed development must be additional.

There is no clarity about **any** of these categories of restoration, given Natural England's lack of monitoring for the Walshaw Moor Catchment Restoration Plan since 2017.

There isn't any attempt to link concerns for the Proposed Development's likely impacts on Walshaw Moor's biodiversity on and above (birds) the protected peatland, with impacts on hydrology, and so on the peat carbon impacts that are the subject of Chapter 9i.

The decommissioning plan is to leave turbine foundations and roads in place, which will permanently alter hydrology, habitat, birds and natural carbon capture and storage.

Meaning that the Scoping Report should scope in continued environmental monitoring of Walshaw Moor over several decades as the only way to begin to understand the long term impacts.

Additional critical Issues have been raised in other Chapter summaries, so won't be repeated here

5. Conclusion - how to keep it all interlinked?

We are aware that in trying to make the links that the Scoping Report hasn't bothered with, there is a fair amount of repetition across our response to different chapters. This makes us wonder whether maybe Scoping Reports for big windfarms on protected peatland need another format that structurally links consideration of all the different aspects that make up upland blanket bog. Instead of splitting them apart and so coming up with what is more or less ecological and environmental impact nonsense.

As it is, an attempt to link everything up ends up meaning having to say some permutation of the same things across about 5 different chapters. Maybe a set of common topics should be put in a pool with a set of little tethered satellites where each individual topic can put their distinct environmental survey/proposed development design material, while interacting with the common material.

Chapter 8 - Hydrology, Hydrogeology, Geology and Peat

Our main concern is the lack of clear, assessable information on how the Scoping Report proposes to assess and mitigate flood risk impacts of the Proposed Development on the Hebden Bridge Flood Area.

We think this is a breach of a national policy requirement for Local Planning Authorities and statutory advisors to have the best and most assessable information from applicants. (2025 Draft NPS EN-1 para 4.2.13)

This failure is compounded by the apparent misuse of the 'Rochdale Envelope 'approach, already described in summaries of Chapters 1, 3 and 5. So we won't repeat it here.

There are various means by which Chapter 8 evades the issue of the Proposed Development's unacceptable flood risk to Hebden Bridge Flood area.

1. Lack of clarity about Study Areas

The proposed 1km Flood Risk Study Area does not extend to the Hebden Bridge flood area. While the 2-5km hydrology study area should include it (since Hebden Bridge is 3.5km from Walshaw Moor) the Scoping Report doesn't explicitly confirm this or properly address the direct hydrological pathways from the moor to the town.

2. Lack of Local Knowledge & Ecological Thinking

The chapter displays a poor understanding of local hydrology. It fails to mention crucial infrastructure like the sluice and spillway in Greave Clough, which directs overflow runoff towards Hebden Bridge, and does not reference the Hebden Bridge Flood Alleviation Scheme, which has just been submitted for planning permission.

3. Fundamental Omission of Blanket Bog

The chapter astonishingly ignores the presence of the living blanket bog habitat. It treats peat, hydrology, and biodiversity as separate issues, failing to recognise they are an interdependent system. The destruction of the bog's surface vegetation through both intentional and unintentional drainage due to the Proposed Development would increase flood risk by speeding up runoff.

4. An Outdated and Flawed Definition of Peat

The report's reliance on a depth-based definition of peat (>0.3m) is scientifically unsound. It disregards Natural England's new guidance and IUCN UK Peat Programme advice that shallow peat <0.3m is ecologically and hydrologically critical. This error underpins ill-founded environmental mitigation measures.

5. Ineffective and Unclear Environmental Measures

The proposed measures during construction and operation are vague and based on the flawed definitions above. Key details are missing, such as volumes of peat to be excavated relative to volumes of peat to be reinstated, the duration of impacts (which evidence of peatland drainage show could last 150+ years), and how runoff will be managed without causing more peat damage. The plan for 'permeable 'access tracks can't disguise the fact that they will still disrupt the peat hydrology, with the near-certain consequence of damage to irreplaceable blanket bog and the disruption of the internationally protected site's integrity that implies. I

6. Dangerous Scoping-Out of Major Risks

We strongly disagree with the decision to scope out the risk of major accidents, including peat slides. The protected moor North West of the site, proposed as the location for the Abnormal Indivisible Load access road, has a history of bog bursts (e.g., Crow Hill, 1824).

Recent peat slides in Shetland linked to wind farm tracks construction show the risk is not necessarily mitigated by reliance on the Scottish Government Peat Landslide Hazard and Risk Assessments guidance, which the Scoping Report advocates.

Although the guidance is the best there is, when it comes to windfarm Environmental Impact Assessment work, developers have tended to cherry-pick only those parts that they can easily address, while ignoring or glossing over the more difficult parts

7. Underestimation of Cabling Impacts

The Scoping Report incorrectly dismisses underground cabling as having no hydrological effects once in operation. Cable trenches can act as drainage channels, disrupting peat hydrology and causing drying, especially on steep slopes. The report also fails to address the potential heat output from cables and its impact on peat.

8. Conclusion

We are dismayed by Chapter 8. It lacks the scientific rigour, local knowledge, and objectivity required for a Nationally Significant Infrastructure Project on internationally protected peatland, that is the source of a flood-prone river in a tightly-packed valley town. It fails to provide the necessary information to assess the true flood risk to Hebden Bridge and identify if it is mitigable, or the irreversible damage to the protected blanket bog and interrelated peatland habitats of the South Pennine Moors SAC/SPA.

Chapter 9: Carbon and Climate Change

1. Fundamental Flaw in Peatland Carbon Accounting

Chapter 9 lacks a credible methodology for measuring carbon emissions from the destruction and drainage of peatland. The developers repeatedly reference the Scottish Carbon Calculator for Wind Farms on Peat, ignoring the fact the IUCN UK Peat Programme has told the DESNZ that before this tool is applied across England's peatlands, the calculator should be significantly updated in the light of recent policy changes and advancements in science.

This is also the recommendation of the recent Scottish government-commissioned Phase 1 review, as detailed in the report 'Carbon Calculator for wind farms on Scottish peatlands: an evidence assessment'.

This means any assessment of the single most significant carbon cost of this development on blanket bog is entirely speculative. A worst-case scenario must be assumed for these emissions until the recommended Calculator updates have been made.

2. Unjustified Assumptions and Lack of Robust Baselines

We strongly object to the unsupported assumption in paragraph 9.3.6 that baseline GHG emissions are "likely to be small." This pre-judges the outcome and avoids the necessary rigorous analysis. A thorough baseline must be established, requiring a range of site survey data.

This should include an assessment against a future scenario where the blanket bog is restored, as per the Walshaw Moor Catchment Restoration Plan and other restoration measures which **Table 7_10 in Para 7.5.28** refers as "normal practice" under the objectives of the designated sites.

This idea is supported by the carbon calculator evidence assessment already referred to. It suggests that the Calculator's focus should shift to evaluating the impacts of windfarm and other development on peatlands/habitat carbon emissions. Specifically, whether it improves the environment and sequesters CO2 effectively. This would redefine 'payback time' as the period needed to restore peatland to a 'near pristine' condition from a reported baseline, compared to, for example, the restoration of the site without a wind farm development, through a variety of other financial sources, given Scotland's widespread peatland restoration efforts.

3. Vague and Meaningless Mitigation Commitments

Section 9.4 on 'Environmental Measures' is devoid of substance. It states that measures "will be implemented" but fails to specify what these measures are, instead using anticipatory language like "it is anticipated that measures...will be included." Crucially, there is no explanation of how the magnitude of "likely significant effects" will be measured, which risks making the entire Environmental Impact Assessment (EIA) a meaningless exercise.

Misleading Use of "Carbon Benefits" and Flawed Displacement Logic

We repeatedly object to the use of the term "carbon benefit(s)" (e.g., 9.5.1, 9.5.7), as it prejudices the assessment's outcome. The logic used to calculate these supposed benefits is fundamentally flawed. The alternative baselines (9.5.13) assume the development will displace gas generation, but this is inaccurate. With over 31GW of wind power already in the pipeline, new developments cannot claim to displace generation that will already have been largely supplanted. Gas generation will primarily act as backup for periods of low wind. The only valid comparison is the emissions intensity of the electricity produced compared to other practical large-scale sources like nuclear, solar, and other wind farms, particularly those on mineral soils.

5. Inappropriate Scoping Out of Emissions and Lack of Clarity

We disagree with the proposal to scope out any emission sources that allegedly constitute less than 1% of the lifecycle carbon (9.5.3). If these emissions have not been quantified, the developers cannot possibly know if they meet this criteria. Furthermore, the statement that "The significance of effects for individual emissions sources will not be considered" (9.5.6) is incomprehensible and requires urgent clarification.

6. Unsubstantiated Methodological Claims and Speculative Statements

The document makes references to methodologies in the 'Hydrology, Hydrogeology, Geology and Peat assessment' (Chapter 8) for measuring peat emissions (9.5.18, 9.5.23), but no such methodology is evident in that chapter. We also reject as entirely speculative the claim that embodied carbon is "likely to represent the largest component" of the lifecycle footprint (9.5.38), especially given the unquantified and potentially massive emissions from peat disturbance, and the likely loss of carbon sequestration as peat forming vegetation and habitats are degraded as a result of adverse impacts on the peat hydrology.

7. Over-optimistic Projections and a Better Way Forward

The use of a 35-year project lifetime is optimistic; a more standard 25-year lifespan should be adopted. Finally, we believe the current site-selection process, driven by developer

Ban the Burn response to Calderdale Energy Park Scoping Report-Summary, September 2025

profit, is flawed. We advocate for a strategic, plan-led approach, where a body like Great British Energy, building on work by the University of Exeter and the RSPB, identifies viable sites with the least impact on communities and nature, thereby streamlining planning and ensuring genuinely green outcomes. We also advocate for landscape scale blanket bog restoration as a better alternative use of Walshaw Moor Estate.

In conclusion, the chapter, in its current form, is inadequate, relies on unjustified assumptions, and fails to provide the rigorous and transparent assessment required to evaluate the true carbon cost of developing on this sensitive peatland habitat.

4.b

From: [REDACTED]

Sent: 19 October 2025 11:07

To: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Subject: New Parliamentary Petition to ban windfarms on protected peatland and Open letter to our MP

Dear [REDACTED]

The re-launched Parliamentary Petition that was suggested at the 18th August 2025 Parish Councils Meeting on the Windfarm was published online on Monday 13th October. Ban the Burn and Upper Calderdale Wildlife Network worked out the ask and the wording.

The petition is online here, <https://petition.parliament.uk/petitions/739659>.

Please will you sign and share it?

The Petitions Committee have apologised for the length of time it took them to process it.

The re-launched petition reads in full:

Amend the Planning & Infrastructure Bill to ban wind farms on protected peatland

We want the government to amend its Planning & Infrastructure Bill to:

- 1. Ban wind farms on peatland in the National Site Network and SSSIs in England, and**
- 2. Require the restoration to good conservation status of peatland's interlinked mosaic of habitats, including irreplaceable blanket bog.**

More details

We believe these amendments are needed to protect peatland's ecological integrity: benefiting climate, biodiversity, water quality and flood risk mitigation. We think that new energy policy statements increase safeguards for peatland, but aren't enough, and still greenlight development on shallower peat - which science warns against. There are concerns that the Sec of State may ignore potential damage to protected sites and approve 'Critical National Priority' windfarms on peatland subject to "compensation" - which we believe is impossible in a near timeframe.

There is an explainer for the petition on the Save and Restore Walshaw Moor website [here](https://saverestorewalshawmoor.wordpress.com/2025/10/14/new-call-to-ban-windfarms-on-protected-peatland-in-england/).: <https://saverestorewalshawmoor.wordpress.com/2025/10/14/new-call-to-ban-windfarms-on-protected-peatland-in-england/>

Basically the explainer focuses on two reasons for signing the petition. (There are more, but these are the most topical/urgent ones.)

One is the highlighted sentence in the More Details section (above). This is because **we urgently have to win the argument about not building on shallow peat, since the UK government is clearly indicating windfarms on shallow peat are acceptable, following NatureScot guidance.**

Since January 2025, when we launched the first Parliamentary petition to ban windfarms on protected peatland in England, the government has introduced new protections for peatland. We welcome them, but as the new petition says, they're not enough.

We're still holding out for a ban not concessions, as the only adequate protection for peatland.

The new policy statements still greenlight building big windfarms on shallow peat - now defined as 0.3m or less, instead of the previous 0.4m. But science warns against building on shallow peat. Both the 0.4m and the '0.3m or less' figures are meaningless in ecological terms. The explainer has a link to an IUCN UK Peat Programme briefing about this.

To win the argument that that building on shallow peat is not acceptable from a climate, biodiversity, water quality or flood risk point of view, we need to gain wide public understanding and support for it before January 2026.

This is the scheduled date for both the Calderdale Energy Park statutory public consultation, and the Calderdale Energy Park Preliminary Environmental Impact Report. We think the proposition that it's ok to build on shallow peat is likely to be a significant part of both these Calderdale Energy Park documents, which are the basis of crucial steps in the pre-application planning process.

The second reason for signing the petition that the explainer focusses on is that the Planning and Infrastructure Bill didn't exist when we launched the first version of the Petition. It does now, it's environmentally atrocious, **and a big part of our campaign over the past six months has been to get the Bill amended as the Petition now calls for.**

We're pretty sure that this work has helped to shift the debate. Blanket bog wasn't mentioned in MPs' debates on the Bill until after our MPs' info event in Parliament at the end of April. We have taken a leaf out of British Cycling Coach Dave Brailsford's book about the aggregation of small gains!

Ban the Burn and Upper Calderdale Wildlife Network – the campaign groups behind the petition – continue to call out the environmental damage the Bill would cause. Please would you do this too? By urgently signing and sharing the new Parliamentary Petition to Amend the Planning and Infrastructure Bill to ban windfarms on protected peatland and restore protected peatland to good conservation status.

The link is here: <https://petition.parliament.uk/petitions/739659>

Finally, and relatedly, Ban the Burn! has written an open letter to the Calder Valley MP, Josh Fenton-Glynn. Ban the Burn and the Upper Calderdale Wildlife Network are inviting any and all Calder Valley Constituents to sign it before 10pm on Sunday 19th October. The Open Letter is online

here. <https://saverestorewalshawmoor.wordpress.com/2025/10/16/open-letter-to-calder-valley-mp-your-question-to-planning-minister-about-guidance-on-building-on-peat/> By the time you receive this email that deadline will have passed, but we're sending the open letter link for your info

Best wishes,

[Redacted Signature]

For Ban the Burn

Save and Restore Walshaw Moor

[Redacted Signature]

[Redacted Signature]

15

Local Environment & Climate 2025-26

Expenditure	Description	BUDGET 26/27	BUDGET 25/26	ACTUAL 2025/26	EXPECTED 2025/26	TOTAL 25/26	BUDGET 24/25	ACTUAL 24/25	BUDGET 23/24	ACTUAL 23/24
Carried over projects	Outstanding payments	£ 3,987.37					£ 6,800.00	£ 6,500.00		
LAND & BIODIVERSITY										
Meadows Day	Room Hire, Forest School Activities, Ecoboys/Local History Walk	£ 821.60	£ 800.00	£ 466.59	£ -	£ 466.59	£ -	£ -	£ 600.00	£ 548.98
Events	Moth Breakfasts, Haytime with Haytime Tea, Bat Walks,	£ 800.00	£ 420.00	£ -	£ -	£ -	£ -	£ -	£ 300.00	£ 186.74
Law Field	Legal Fees	£ 1,027.00	£ 1,000.00	£ -	£ -	£ -	£ -	£ -	£ -	£ -
Equipment & Tools	For Volunteering	£ 1,500.00	£ 20.00	£ 82.30		£ 82.30	£ -	£ -	£ -	£ -
Materials	Replacement trees, gate fixings etc	£ 750.00								
Dog Waste Provision	Dog poo bags & dispenser maintenance	£ 1,000.00								
CROWS	Proposed Annual Payment	£ 1,500.00								
ENVIRONMENT										
New Projects	TBC	£ 5,000.00	£ 7,020.00	£ 7,664.00	£ -	£ 7,664.00	£ 1,775.00	£ 8,775.00	£ -	£ -
Hanging Baskets	Supply/Install/Watering	£ 17,500.00	£ 15,000.00	£ 16,532.00	£ -	£ 16,532.00	£ 7,000.00	£ 6,561.98		
Transport	Active Travel - Committee to consider	£ -	£ -				£ 2,000.00	£ 2,000.00	£ 6,000.00	£ -
Green Hub	New Project - with Pt&E	£ 1,000.00								
Supporting Outside Bodies	e.g. Supporting Friends CHP	£ 500.00								
Youth engagement	TBC	£ 500.00								
Transport (for consideration)	Electric Van Hire & Charging point	£ 4,000.00								
ALLOTMENTS										
Allotment Maintenance	General Maintenance e.g. sheds, footpath	£ 1,000.00	£ 1,500.00	£ 377.84	£ 3,087.37	£ 3,465.21	£ 4,000.00	£ 4,000.00		
Tool Hire	Chainsaw & Brushcutter	£ 500.00								
Materials	Paint/Force Panels	£ 500.00								
REDUNDANT BUDGET LINES										
Grazing & Management									£ 700.00	£ 271.00
Tree Guards									£ 800.00	£ 150.00
Ponds									£ 600.00	£ -
Marketing									£ 100.00	£ 73.20
Young People/Youth									£ 5,000.00	£ 4,787.61
Buildings & Tech									£ 5,000.00	£ 1,284.00
Cross Cutting							£ 2,500.00	£ 2,740.00	£ 2,000.00	£ 1,294.63
Power Scythe			£ 1,100.00	£ -	£ -	£ -	£ -	£ -	£ -	£ -
Scything & Haymaking			£ 1,500.00	£ 799.14	£ -	£ 799.14	£ -	£ -	£ 1,100.00	£ 1,000.00
Friends of High First			£ 150.00	£ 130.00	£ -	£ 130.00	£ -	£ -	£ -	£ -
Site Surveys			£ 300.00	£ -	£ -	£ -	£ -	£ -	£ 500.00	£ 557.00
Coppicing			£ 500.00	£ 160.00	£ -	£ -	£ -	£ -	£ 300.00	£ 407.00
TOTAL		£ 40,985.97	£ 25,740.00	£ 26,612.73	£ 3,087.37	£ 30,699.24	£ 33,273.00	£ 40,076.98	£ 23,309.00	£ 8,576.16
BUDGET REQUIRED		£ 40,985.97				£ 25,790.00		£ 33,273.00		£ 25,200.00
INCOME										
Scything Course				£ 240.00		£ 240.00	£ 240.00			
Hanging Baskets (based on £60)		£ 8,450.00		£ 5,912.00		£ 5,912.00				
Allotments		£ 2,000.00		£ 2,500.00		£ 2,500.00				
Coppice Products		£ 100.00								
Grants										
PORPOSED TOTAL BUDGET		£ 32,415.97				£ 3,987.37		£ 6,581.98		£ 16,833.84

ACCRUED AMOUNTS
Committed expenditure not included to accrue in to 2026-27 budget

Completed for 2025

£20 donation from Rachel Cooper for High First

8.1a

To Members of the Local Environment and Climate Committee 2025

1. Terms of Reference

- 1.1 Purpose of the report to consider a calendar of activities and events at High Hirst Woodmeadow

2. Recommendation

- 2.1 To deliver volunteer activities and events at High Hirst Woodmeadow.

3. Background

- 3.1 HRTC has delivered several volunteer activities and events in the past.
- 3.2 Since 2023 HRTC has delivered and facilitated volunteer activities and events on site
Including:
Practical Conservation Activities: tree planting, mowing and haymaking, vegetation management, coppicing, Sheep Watch
Events: Moth Breakfasts, Meadows Day inc. Ecology & Local History walks, Learn to Scythe workshop, Haytime with Haytime Tea, Bat Walks.
- 3.3 Residents and existing volunteers on site have expressed interest in these activities being run in the future plus additional events and activities.
- 3.4 Additional proposed activities: pond maintenance, plug planting, drystone walling, hedge laying, fencing repairs, seed collection, tool maintenance, owl box maintenance
- 3.5 Additional proposed events: Wassailing, Dawn Chorus Walk, Fungi Foray (ID Walk), Apple Day

4. Information

- 4.1 Gareth Muir can deliver the following activities: coppicing, mowing and haymaking, vegetation management, pond maintenance, plug planting, hedge laying, fencing repairs, seed collection, tool maintenance and owl box maintenance.
- 4.2 Facilitators are available to be engaged to deliver the following activities: drystone walling and Sheep Watch.
- 4.3 Gareth Muir can deliver the following Events: Meadows Day, Wassailing and Apple Day
- 4.4 Facilitators can be engaged to deliver/coproduce the following Events: Moth breakfasts, Ecology & Local History Walks, Learn to Scythe Workshop, Haytime with Haytime Tea, Bat Walks, Dawn Chorus Walks, Fungi Foray
- 4.5 Costs: Equipment and tool cost – see separate cost breakdown
Bat Walks April-September, July – Survey (National Bat Monitoring).
Drystone Walling £50
Meadows Day £800
Wassailing £50
Apple Day £50

Ecology Walk £50
Local History Walk £50
Learn to Scythe Workshop £1500
Haytime with Haytime Tea £320
Dawn Chorus Walk £80
Moth Breakfast £130

9a

To Members of the Local Environment and Allotment Committee

1. Terms of Reference

- 1.1 Purpose of the report is to consider the removal of trees at High Hirst Allotments, Hebden Bridge
-

2. Recommendation

- 2.1 The officer recommends the removal of trees on plots 34, 35, 36 and uncultivated areas on site.
-

3. Background

- 3.1 The trees on site have not been adequately managed and as such cast shadow over the site, take up ground water and nutrients negatively impacting on the Tenant's ability to cultivate their plots.
- 3.2 Trees have self-seeded on the site since HRTC acquired the site from CMBC (2014) said trees are inappropriate species; not being soft fruit bearing, for example, Downy Birch and Willow. This is in contravention to a covenant from CMBC as the site to be used as an allotment. HRTC has an obligation as a Tenant of CMBC to ensure that the site is in good order and there is no non-timber trees planted on site.
-

4. Information

- 4.1 Gareth Muir is qualified to fell trees up to 280mm in diameter and can carry out the works, EPS chainsaw hire is £49 per day plus vat. One day would be required to carry out the works.
- 4.2 These works would be undertaken in the winter period to minimise the impact on site tenant's growing.
- 4.3 The resultant cuttings and brash can be removed from site: Forus Trees have offered to take any lengths over 8cm in diameter and Dod Pod Holiday Club have offered to receive material for use in dead hedging and den building on Dodnaze Forest School Area.
- 4.4 The site does not have any Tree Protection Orders and the volume to be felled and removed does not warrant a Felling License (under 1x medium oak per calendar quarter)
- 4.5 Subsequent tree regeneration can be managed by Tenants using hand tools: bow/pruning saws and loppers.

To **Members of the *Local Environment and Climate Committee***

1. Terms of Reference

- 1.1 Purpose of the report to outline a work plan for upkeep and maintenance of HRTC Allotment Sites; Banksfield and High Hirst

2. Recommendation

- 2.1 The Officer recommends organising a quarterly work party day on the allotment sites to ensure the maintenance and upkeep of communal areas and boundaries on the sites.

3. Background

- 3.1 Both sites have been undermaintained in the past and consequently pathways have been impassable, boundaries have been compromised, and trees/shrubs have grown beyond reasonable management by Tenants
- 3.2 As part of HRTC's Lease on both site from Calderdale MBC, HRTC is expected to keep the site's footpaths and boundaries safe and secure.

4. Information

- 4.1 Quarterly workdays where the Officer leads Tenants in site maintenance tasks, will fulfil Lease agreements with CMBC, upskill Tenants and ensure that the sites are safe, secure and attractive.
- 4.2 Host a biannual Tenants meeting alternating between a venue in Hebden Bridge and Mytholmroyd to engage with Tenants issues and to plan workdays. Suggested for January and June.
- 4.3 Timeline:
Tasks
Spring - Footpaths, signage cleaning, Composting
Summer - Footpaths, painting, vegetation management, Skip Day, Composting, pond maintenance
Autumn - Footpaths, tree pruning, Composting
Winter - Footpaths, boundary repairs, tree works, Composting
Costs:
Trimmer Hire (Spring & Summer) £28 per day plus VAT, £2 for blades – EPS Tool Hire
Chainsaw Hire (Winter) £49 per day inc. fuel
Materials: Paint 5 litre Green Ronseal One Coat £8 x4
Skip Hire: £215 – Calder Valley Skip Hire one for Banksfield and one for High Hirst

To Members of the *Local Environment and Climate Committee*

1. Terms of Reference

- 1.1 Purpose of the report; to consider an annual payment to Community Rights Of Way Service (CROWS) for on going access works in Hebden Royd

2. Recommendation

- 2.1 The Officer recommends that HRTC pay CROWS £1500 annually for works in Hebden Royd, including, but not limited to improving access to public rights of way under the administration of HRTC, CMBC and others.

3. Background

- 3.1 Several public rights of way and permissive pathways in Hebden Royd and under managed and as such access to green spaces are reduced. CROWS active in the Parish and have undertaken a variety of works of this nature.
- 3.2 Due to financial pressures Calderdale MBC Countryside Service has reduced capacity to deliver access works in the Parish.
CROWS operate within this Niche.
CROWS currently have a relationship with other Town Councils (Todmorden) and Parish Councils (e.g. Wadsworth).
The Officer recommends an annual payment is given to CROWS by these other Councils and a similar arrangement with HRTC would be beneficial to the Parish and support a local organisation in CROWS.

4. Information

- 4.1 CROWS report that £1500 per annum would allow them to undertake works in the Parish. This would include small projects such as repairing stiles and gates, cutting back vegetation, improving drainage, improving footpaths and surfaces, rebuilding/repairing stairs.
- 4.2 As there is half the financial year remaining a £750 payment could be paid and from March 2026 a £1500 payment could be made, with half being paid once the work has been undertaken for half the year then paid in arrears. This is the same financial arrangement CROWS have with Todmorden Council. For Todmorden Town Council CROWS claim the money when they have completed the first half of the year (sending Todmorden Council the spreadsheet and an invoice) – so CROWS are funded in arrears.
- 4.3 The Committee is advised to consider the annual payment of £1500 and make funds available in the next financial year's budget.
- 4.4 Considerations include whether the payment is affordable and offers the best value for money for Parishioners.
- 4.5 CROWS are a registered charity (number 1201645) and are covered by The Charities Act 2022.