



Upper Calderdale Wildlife Network c/o Middle Bottomley Bottomley Road Todmorden Lancashire OL14 6QZ

Edward Miliband  
Shadow Secretary of State for Energy Security and Net Zero  
House of Commons  
London  
SW1A 0AA

June 14th 2024

Dear Edward

**Proposals for an onshore wind farm on Walshaw Moor, Calderdale Wind Farm, West Yorkshire**

I am contacting you about proposals for a major wind farm development on the South Pennine moors above Hebden Bridge and Haworth in West Yorkshire. Developers World Wide Renewable Energy Global Ltd (WWRE) are proposing to construct what could become England's largest onshore windfarm with up to 65 turbines at a height of up to 200 metres.

I am a member of the Upper Calderdale Wildlife Network, and we are hugely concerned about the damage that this massive industrial scheme would have on our nationally and internationally protected moorland habitats. Walshaw Moor and its environs are protected by a raft of designations:

- SPA (South Pennine Moors Phase 2 Special Protection Area)
- SAC (South Pennine Moors Special Area of Conservation)
- SSSI (South Pennine Moors Site of Special Scientific Interest).

Our group recognises that we must embrace renewable energy to combat the terrible consequences of climate change, but we know that this development is proposed in the wrong place. Building the wind farm here would be catastrophic for nature, exacerbate already very serious local flooding, destroy the precious sense of wilderness and result in the destruction of vast areas of protected peatland habitat. This special landscape is important both to local people and those far and wide through association with the great literature of writers such as Ted Hughes and the Bronte sisters.

We are concerned that this project epitomises the way that two areas of critical importance, namely the need for nature recovery and the need to reduce our use of carbon are pitted against each other. We consider that strong guidance from government can address this balance and there is good evidence to show that there is no need for this conflict of interests.

Friends of the Earth in association with Exeter University have recently published a map of renewable energy sites across England demonstrating that there is adequate space for generating renewable energy in England without resorting to building on important wildlife and protected peatland habitats: the site of Calderdale Wind Farm is not identified as a potential site for renewable energy generation on this map.

Peat is the largest and most efficient land-based storage system for carbon, storing ten times more carbon per hectare than any other land-based ecosystem, and we believe that building wind farms on peat is counterproductive to the objective of seeking net zero emissions. There is clear evidence that the scale of construction works required to install wind turbines causes irreparable damage to peat. Any excavation of peat will be damaging but turbine construction and its' associated infrastructure will also affect hydrology, causing peatlands to dry out such that they will become a net emitter of carbon rather than a carbon sink.

We believe that the developer of Calderdale Wind Farm sees this proposal as a test case for building wind farms on peat, and we are extremely concerned that approval of this scheme could result in a rush of developers looking to build on peat, with the many ramifications that would have.

Natural England's publication 'Investigating the impacts of windfarm development on peatlands in England' summarises the impact of building wind farms on peatlands stating '*vegetation on blanket bogs is very sensitive to lowering of the water table and activities which may result in erosion of the peat*' and '*Drainage around the turbine base and other infrastructure such as roads will change the current water flow patterns across and through the peatland. Its impact is likely to be negative on intact bogs....*' and '*Increased risk of peat slide is likely on intact and degraded sites as a consequence of excavations, installations, lorry movements and changed water flow patterns*'.

That such a precious place as Walshaw Moor is threatened by wind turbine construction is due to the lack of any national planning strategy for wind energy or other renewables, and the market lead nature of the industry, which pays little regard to wildlife designations and peatlands.

With the announcement of the General Election, we feel there is a strong likelihood that there will be a change of government in July, and you may become Secretary of State for Energy Security and Net Zero. At first glance this onshore scheme will sound very attractive in enabling England's renewable energy targets to be met, but I hope I have flagged up early the very real issues that we believe are associated with it.

We would like a new Labour government to:

- Ensure places of special value for wildlife are fully protected from development, so that sites with national and international designations including SAC's SPA's and SSSI's are scoped out of development for renewable energy schemes at the earliest stage, avoiding costly and time consuming planning applications.
- Fully consider the important ramifications of building on peat and the implications this has for climate change.

We also consider that the way renewable energy projects are planned needs to be urgently addressed by any new government.

We hope that if the Labour government is elected and you continue Secretary of State for Energy Security and Net Zero that you will be able to address the points we have made in connection with this major development.

Yours sincerely

Penny Price

on behalf of UCWN (Upper Calderdale Wildlife Network)

Cc Steve Reed, Shadow Secretary for the Environment, Food and Rural Affairs