

Report 1: Consequences of the failure of due diligence by Algihaz Holding in the matter of the aggregates required to build Calderdale Energy Park.

A report for Mustapha Hajjar, CEO Algihaz by WTRG

It is likely that the CEO of Algihaz Holding, Mustapha Hajjar, is unaware of the extent of published incompetence of their subsidiary Calderdale Wind Farm Ltd. We suggest that Mustapha Hajjar refers to Dr Ghazi Osman, CEO Algihaz Holding Energy, for a fuller understanding of the seriousness of the position. This document will be the first of a series of reports for Mustapha Hajjar from the Walshaw Turbines Research Group (WTRG). Dr Osman will be able to give his CEO an account of the penetration of WTRG into the errors and incompetence of Algihaz on Walshaw Moor.

CWF Ltd and Algihaz are now in receipt of a legal letter-before-action concerning the aggregate problem described here. We expect these reports will help Mustapha Hajjar attain a better understanding of the behaviour of a subsidiary whose Director is Dr Ghazi Osman, CEO Algihaz Energy.

The titles and publication dates of the series are as follows:

Report 1: 25 July 2026

Consequences of the failure of due diligence by Algihaz Holding in the matter of the aggregates required to build Calderdale Energy Park. Consequences for the reputation of Algihaz Holding. Legal consequences.

Report 2: 14 August 2026

Consequences of the Algihaz due diligence failure (November 2021) for the question of Alternatives. Logged advice of the Planning Inspectorate concerning Alternatives.

Report 3: 7 September 2026

Catalogue Raisonné of Algihaz incompetence on Walshaw Moor.

Report 4: 21 September 2026

Relationship of Calderdale Energy Park to the Pennine Gateway National Nature Reserve sponsored by His Majesty the King; the Vision 2030 for the Kingdom of Saudi Arabia, led by Crown Prince Mohammed bin Salman.

It is the intention of this series of reports to inform Mustapha Hajjar of the way in which the incompetent performance of CWF Ltd has already undermined the reputation of Algihaz. The reports will all be in the public domain.

Our first report concerns the failure of Algihaz during due diligence in November 2021 to discover the weakness of the gritstone aggregates. This matter is now the subject of a legal letter from Colne Town Council to CWF Ltd alleging that the consultations financed by Algihaz are prima facie unlawful under English common law in respect of Gunning.

Even more serious, the failure of due diligence with respect to the aggregates is evidence that Algihaz did not consider alternative sites. This failure of due diligence by Algihaz will be central during the examination phase for CEP and at any subsequent judicial review.

WTRG advise Mustapha Hajjar to acquaint himself with the justified mockery of Algihaz which is already in the public domain consequent on the incompetence of CWF Ltd and Algihaz

WTRG consider Algihaz to be a reputable company but CWF Ltd is not a reputable company, and our reports constitute the evidence. Comparisons of the incompetent performance of CWF Ltd with the mission statement of Algihaz are already in the public domain, and Algihaz must expect to be tarred by the same brush if they persist in their association with CWF Ltd. However, in the case of their due diligence failure on Walshaw Moor in November 2021, Algihaz are solely to blame.

1. Failure to discover and disclose the huge requirement for noncalcareous aggregate

CWF Ltd, a subsidiary of Algihaz Holding, had not consulted any community about the 616,000 tonnes of granite they announced for the first time on 8 April 2026 would be required to build Calderdale Energy Park. In particular they had not consulted any community in North Yorkshire, yet their traffic assessment has 411,000 tonnes of granite coming from North Yorkshire and 205,000 tonnes going through Colne, past Boundary Mill. The traffic assessment relies on assumptions that were not consistently disclosed through the consultation process. This may have limited the ability of communities to understand or respond to peak HGV impacts at earlier stages.

2. Failure stems from inadequate due diligence by Algihaz in November 2021

Algihaz should have discovered they would need granite, in vast quantity, during the due diligence before an agreement was signed between the Algihaz and Richard Bannister, the owner of Walshaw Moor on 11 November 2021. Richard Bannister would have told Algihaz of the problem had he been asked directly, as suitable aggregates are required in the repair of the estate tracks. Had Algihaz read the 2017 agreement between Natural England and their counterparty Richard Bannister, they would have known there was an aggregate problem on Walshaw Moor, and a single question asked of Richard Bannister would have found that the estate imported blue granite for the tracks. Algihaz did not undertake adequate due diligence with respect to the aggregates in November 2021. The date of the agreement is given in multiple documents, including the title register for WYK902046.

3. Failure of Algihaz to identify unsuitability of limestone at due diligence

Had Algihaz discovered the weakness of the onsite rock, and that Natural England required Mr Bannister to use an inert rock (not limestone, which is a sphagnum poison) to build his estate tracks, it is very likely that they would have instructed CWF Ltd to find an alternative site.

4. Consequences for Alternatives

The 2017 agreement should have formed part of an adequate due diligence process in November 2021. CWF Ltd should have had alternatives under the habitat regulations because Walshaw Moor is an SPA and SAC, one of only twenty such doubly-designated sites in England. Suitable alternative sites would not have suffered the huge cost of the granite deliveries, the ecological damage of the deliveries, and the planning difficulties of importing a vast quantity of alien material through inevitable pinch-points far away from the site. The alternative sites would also not have involved the internationally renowned Brontë Moor. The only site in England comparable to the extremity of Walshaw Moor on the SAC/SPA/Heritage axes is Ashdown Forest, the location of *The House at Pooh Corner*.

Given Algihaz's inadequate due diligence about the aggregates, these "alternatives" will be intensively scrutinised in examination and at judicial review if necessary. Algihaz can expect to hear more about *The House at Pooh Corner*. There is no translation into Arabic as yet of the difficult second volume, but *Winnie the Pooh* is available from the Ishi Press. Algihaz are advised that the Disney version does not capture the problematic nature of Ashdown Forest as an alternative industrial site for their proposed wind farm.

5. Algihaz informed of the aggregate problem 17 May 2025

Algihaz and CWF Ltd failed to discover the need for granite for almost four years. Many attempts were made by WTRG and Robbie Moore MP to inform Algihaz of the aggregate problem. Finally, Algihaz were given (by WTRG on 17 May 2025) irrefutable evidence that the onsite rock, and the gritstone aggregates available in West Yorkshire and Lancashire, were “too weak and porous, and susceptible to frost” to be suitable for road stone or technical concrete. This evidence consists of the notes printed on BGS Sheet 77 Huddersfield and the aggregate assessments published annually by the five West Yorkshire councils. The facts are known by every local reputable builder and by Richard Bannister’s gamekeepers. It is because it is so simple to acquire this information that the Algihaz due diligence must have been inadequate in November 2021.

6. Algihaz make a verbal admission of the problem 21 May 2025

Though their consultant Donald Mackay, Algihaz and CWF Ltd then made a verbal admission of their aggregate problem on their Webinar (21 May 2025 43:46) in a statement that begins “As you can imagine...”.

Not only could the communities in North Yorkshire and East Lancashire not be expected to “imagine” the need for 616,000 tonnes of granite, but Algihaz and CWF Ltd had themselves failed to “imagine” this material fact for almost four years. Algihaz had also failed to “imagine” this when they performed so-called “due diligence” so inadequately in November 2021. **All the Algihaz due diligence team had to do was ask Richard Bannister about his estate track materials.**

“As you can imagine...” contradicted other verbal statements made by the consultants during the non-statutory consultation. It also contradicted the only written statement by CWF Ltd that the wind farm would be built of on-site aggregates supplemented by “quarries east of the site”. The people of North Yorkshire did not need to “imagine” the aggregates because in September 2023, CWF Ltd stated the aggregates to be West Yorkshire gritstone, mostly won on site, and this was the published policy of Algihaz until 8 April 2026.

7. Algihaz had designed CEP without knowing about their aggregate problem

CWF Ltd should have re-run the Non-statutory Consultation with a transparent statement that a huge quantity of granite would have to be imported. They failed to do so. WTRG sent a legal letter to CWF Ltd (1 June, replied 5 June 2025) stating that this failure made the Non-statutory Consultation *prima facie* unlawful under Gunning Principle 2 (‘intelligent consideration’). CWF Ltd answered the letter without engaging at all with the facts of the granite. They then failed to rerun the consultation.

Algihaz should have insisted that the non-statutory consultation was re-run. It was not difficult to estimate the quantity required for the proposal as then configured: WTRG estimated 600,000 tonnes on 5 May 2025. The approximate quantity and aggregate type should have been found by Algihaz due diligence in November 2021.

8. Failure of the Scoping Report

Algihaz and CWF Ltd then had a third opportunity to initiate consultation about the granite with the affected communities with their Scoping Report (1 September 2025). Not only was the granite not mentioned in the Scoping Report, but it had 24 separate road-numbering errors and dozens of very serious errors of other kinds, entirely unprecedented in any similar document for an on-shore wind farm of 100 MW+. It was impossible for anyone to disentangle the aggregate position in the Scoping Report because no aggregate type (granite/limestone) was mentioned, and the roads were so scrambled that the M65 often appears as the M56 while the A646 can be the A644 and even the impossible A464. A full account will be given in the forthcoming WTRG *Catalogue Raisonné of Algihaz Incompetence*.

The Planning Inspectorate drew CWF Ltd's attention to the list of road-numbering errors supplied in the Stronger Together response to the Scoping Report. It is not known what measures Algihaz took to censure their vehicle CWF Ltd for the wholly unprecedented incompetence of the Scoping Report, which includes references to the river Kelvin running through the site and a hydrology map with 13 different kinds of error, best described as "child-like". If it emerges during examination or at judicial review that Algihaz did not censure CWF Ltd for the Scoping Report incompetence, and did not take steps to improve performance, then Algihaz will be taken as accepting as normal this extraordinary incompetence by their vehicle CWF Ltd.

9. Admission of aggregate problem in the PEIR

In the PEIR (8 April 2026) Algihaz and CWF Ltd finally admitted what should have been known to them on 11 November 2021. **The onsite rock could only supply weak bulk fill** and 616,000 tonnes of noncalcareous hard stone (i.e. not limestone) would have to be imported from beyond Yorkshire and Lancashire. Three consultations (September 2023, April 2025, September 2025) had passed without this fact being indicated. The only written statement prior to 8 April 2026 was that the wind farm would be built of onsite gritstone, supplemented by Halifax gritstone quarries to the east.

The PEIR has multiple severe errors that have all been discovered by the public during the statutory consultation. It is not known what measures Algihaz have taken to censure their vehicle CWF Ltd for unprecedented location turbine errors in the PEIR and other serious and dangerous errors.

10. PEIR traffic assessment is not coherent with Materials and Waste chapter

The PEIR (Appendix 14-1) has a traffic assessment by Pell Frischmann. The 616,000 tonnes of granite is modelled as delivered to the western site entrance on the Lancashire Moor Road in 30800 HGVs, each carrying 20 tonnes. The origins of the granite are not stated in the traffic assessment, but Pell Frischmann were nonetheless able to attribute the granite HGV traffic to particular routes in their model. Only the routes for month 21 are given, but since the granite deliveries are modelled as flat 3850 (two-way) HGV movements per month for 16 months (Table 10), we must assume that the granite distribution is the same in all 16 months. The granite HGVs are shown (Table 11) as 74 on M65 at Burnley and 148 on A56 from west of Skipton to Kelbrook. The 74 HGVs on the M65 go via the Boundary Mill roundabout and through Colne, while the 148 HGVs follow the A56 through Broughton, Earby, Foulridge and Kelbrook and other settlements on the A56. The routes are specified by Pell Frischmann's use of DfT checkpoint data for existing traffic flows.

11. Pell Frischmann unaware of the aggregate problem

Not only has this granite never been consulted until 8 April 2026, but its movement and origin still remains almost unexplained in the PEIR. Pell Frischmann must have been given some assumptions about granite sources to develop the traffic assessment, but those assumptions are not stated in Chapter 14. It was later admitted by Damien Kilburn of Pell Frischmann (29 June 2026) that the company had assumed limestone. He did not know of the problem with limestone for the proposal. He then said that West Yorkshire gritstone quarries might supply the aggregate. It was now clear that Pell Frischmann were unaware of the aggregate problem when they made their traffic assessment.

12. Horton rail head not suitable

However, in footnote 48 of the Materials and Waste (Ch 22) of the PEIR is an indication of an explanation for the granite distribution. It is suggested that the granite "may" be delivered to rail heads and Leyland and Horton "may" be used. WTRG spoke to Donald Mackay at the Hebden Bridge consultation about both rail heads, and his statements show that both had received his attention. "I have used Leyland before." "Horton can be used as a receiving depot. All it needs is some bulldozers." This statement about Horton is incorrect on multiple technical and planning grounds.

It transpired from statement made by Damien Kilburn that Pell Frischmann were unaware of the use of rail heads. Their assumptions were direct delivery of limestone from North Yorkshire.

Elsewhere in the PEIR an 80% Dales assumption is stated, but this is not reflected in the traffic assessment.

13. Conflict of interest of Richard Bannister

It is necessary and relevant to observe the conflict of interest for the Walshaw Moor owner Richard Bannister, since he also owns the huge and commercially successful Boundary Mill outlet at the M65 roundabout in Colne. The stone on the A56 through North Yorkshire obviously reduces the amount going past Boundary Mill, yet the Boundary Mill delivery route is much simpler (though entirely unconsulted) by the M65 from Leyland. *Prima facie*, the granite is being routed via the Dales (where there is no granite, no motorway and no receiving depot) in order to reduce the amount of granite passing Boundary Mill to a fraction of its potential worst case scenario.

14. Communities unconsulted about huge granite requirements

The proposal laid out in the PEIR imposes an unconsulted burden on the communities of North Yorkshire (411,000 tonnes) and Colne (205,000 tonnes) for the failure of Algi haz to do adequate due diligence in November 2021. Imposing such a burden on the communities of East Lancashire and North Yorkshire for the inadequate due diligence of Algi haz runs entirely counter to the mission statement of Algi haz, who are a reputable company. By contrast, CWF Ltd had no reputation at inception, and subsequent errors have caused the company to lose reputation. The reputation of Algi haz has already been damaged by the behaviour of their incompetent vehicle CWF Ltd. Algi haz and CWF Ltd have been caught scrambling for granite following their inadequate due diligence in November 2021.

15. Consequences of the unjustified assumption about Horton

It must be noted that the absurdity of the “Horton” option may lead to the granite defaulting to 100% Colne. This hitherto unconsulted granite then causes a wholly unacceptable and unconsulted impact on Colne. In all events, the hitherto unconsulted granite will inevitably cause wholly unconsulted impacts on the community of Laneslaw Bridge. The alien granite will inevitably cause a hitherto unconsulted impact to the internationally renowned heritage and internationally designated habitats of Walshaw Moor.

16. Conflict with the mission statement of Algi haz



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Growth and sustainability.

Algi haz is an investment holding company based in Saudi Arabia with a demonstrated track record of success in infrastructure, renewable energy, healthcare, experiential services, advanced technology and real estate. We combine global partnerships, that bring best-in-class expertise in our target sectors, with long-term and trusted relationships, robust local capability, and market expertise.

Founded by Saeed Ali Al-Angari in 1975, Algi haz has grown from a construction contracting company to a multi-billion riyal strategic investment group. Our passion, dedication, and strong partnerships have allowed us to develop expertise and drive innovation across a range of sectors that will positively impact our communities for generations to come.

The performance of CWF Ltd cannot have been part of a “best-in-class” partnership. CWF Ltd repeatedly demonstrated unacceptable incompetence, wholly unprecedented in the sector. CWF Ltd have not exhibited “robust local capability”; their performance has been frail, desk-based, cut-and-paste and thus subjected to justified public mockery.

The “passion and dedication” of Algihaz was not enough to prevent inadequate due diligence in November 2021 when they signed the agreement with Richard Bannister.

The “demonstrated track record” of Algihaz now includes their partnership with CWF Ltd.

“Long-term and trusted relationships” have not been formed; the incompetence has been so great that CWF Ltd find themselves constantly exposed by external audit; nothing CWF Ltd say can be “taken on trust” everything CWF Ltd say has to be checked on the ground. Much of it has been checked and found wanting.

17. Minimum necessary action for Algihaz to protect its reputation

Algihaz must now insist that their vehicle CWF Ltd withdraws the PEIR. The Algihaz Environment, Social and Governance standards state:

At Algihaz Holding we are proud to manage our operations responsibly and, in a similar vein, we seek responsible investment. As such, we have developed and are in the process of implementing a robust and systemic approach to ESG at the corporate level. This includes a framework for our investment activities to ensure that we continue to achieve sustainable growth while conserving resources for our planet and making a positive impact for all those in our communities. Our ESG values are developed as follows:

The identification, assessment and responsible management of ESG risks and opportunities is essential to the sustainable long-term development of our assets and the communities in which they operate.

ESG considerations are embedded within our investment decision-making approach and the asset management governance that inform the way in which our portfolio companies assess and improve their performance.

We partner with our portfolio investments to share best practice and drive positive change. We seek to improve working conditions, minimize environmental impact and preserve the cultural heritage of the communities in which we invest.

The present turbine layout was designed without reference to the huge quantity of granite must be imported to Walshaw Moor. Algihaz failed to “minimize environmental impact” because their “due diligence” in November 2021 neglected the construction materials.

CWF Ltd has not been “managed responsibly” by Algihaz, but has been allowed to make repeated serious and comical errors without apparent consequences.

Walshaw Moor is the internationally renowned inspiration for the Brontë sisters. Algihaz will not “preserve the cultural heritage of the communities in which we invest”.

The proposal must be redesigned in the light of the granite. It must then pass through a non-statutory consultation so that the people of the UK can give the proposal intelligent consideration. Walshaw Moor is not a “local moor”. It is internationally designated as SPA and SAC, and internationally renowned as the Brontë Moor.

A new Scoping Report must be published and consulted, and that Scoping Report must be free of the astonishing errors that blight its predecessor, and which will prove so damaging to the reputation of Algihaz should this matter ever come to judicial review.

A new PEIR must then be published, and it must be subject to Statutory Consultation so that the expert public can check it. These consultations are essential, because all of the problems with the rock

laid out here were discovered by the public, not by CWF Ltd (and their consultants) and not by Aljihaz.

The proposal may then win the trust of the British people, asked to consider the industrialisation of an internationally designated SPA and SAC and the internationally renowned Brontë Moor.

The proposal may then be fit for examination by the Planning Inspectorate, acting for the Secretary of State for Energy Security and Net Zero.

18. The trust of Aljihaz has been betrayed by their vehicle CWF Ltd

Alternatively, Aljihaz may decide to cease their generous investment in CWF Ltd, who have consistently betrayed the trust of Aljihaz by publishing wrong statements and dangerous proposals, which the public have had to correct in all four iterations brought to consultation (September 2023, April 2025, September 2025, April 2026). CWF Ltd have been sent extensive notifications of these incorrect statements in the PEIR, and the Planning Inspectorate has confirmed receipt of these notifications. An extensive account (*Catalogue Raisonné*) of the incompetence of CWF Ltd is in preparation for Mustapha Hajjar. Aljihaz should study these accounts and notifications and letters-before-action prior to any further investment so they can assess the damage to date and mitigate further damage to their reputation if the proposal passes to examination and judicial review.

19. UK national interest undermined by the incompetence of CWF Ltd

Is it in the UK national interest for a proposal as incompetent as Calderdale Energy Park to proceed to examination as specified? Relationships with essential foreign investors are inevitably damaged when UK management of the investment is incompetent, and further exposure of CWF Ltd incompetence across multiple chapters is inevitable at examination and judicial review. The reputation of the UK onshore wind industry must be protected from developer incompetence on this scale.

20. Relationship of CEP and Kunming-Montreal GBF

Both the UK and Saudi Arabia have been leaders in the Kunming-Montreal Global Biodiversity Framework. Saudi Arabia are ahead of the UK in specifying the sites for the 30 by30 commitment. Walshaw Moor is an SPA and SAC and so an anchor for the UK 's attempts to meet a target that they themselves led. In the interests of nature, it should be made clear that the inadequacy of CWF Ltd and Aljihaz in the matter of Calderdale Energy Park was caused by the performance of those companies and their consultants and not by (in the simplistic rhetoric of former Prime Minister Sir Keir Starmer) "bats and newts". This matter will be explored in the fourth WTRG report for Mustapha Hajjar: *Relationship of Calderdale Energy Park to the Pennine Gateway National Nature Reserve sponsored by His Majesty the King; and the Vision 2030 for the Kingdom of Saudi Arabia, led by Crown Prince Mohammed bin Salman.*

21. Reputation of Aljihaz can only suffer further damage

Public confidence in the Net Zero policy is likely to be undermined by incompetence on the scale of the Calderdale Energy Park proposal, which would be England's largest onshore wind farm and is on world famous ground: the Brontë Moor ; and the incompetence is certain to become more widely known at examination and judicial review if the proposal is not redesigned and then properly consulted.