

WTRG Report 2: The question of alternatives

This series of reports are written for Mustapha Hajjar, CEO of Algihaz by WTRG. Mustapha Hajjar can confirm the penetration of WTRG into the errors of Algihaz on Walshaw Moor be referring to his subordinate Dr Ghazi Osman, Director of CWF Ltd and CEO of Algihaz Energy.

1. The Algihaz aggregate problem is primary evidence in the matter of alternatives

In our first report to Mustapha Hajjar, dated 25 July 2026, WTRG laid out the “aggregate problem” which Algihaz face in the development of Calderdale Energy Park on Walshaw Moor. The requirement for 616,000 tonnes of noncalcareous aggregate is itself a serious problem for Algihaz because its existence and delivery was not consulted in a timely or effective manner at each of four consultations. The aggregate problem is primary evidence in the crucial matter of alternatives because Algihaz failed to discover it at due diligence in November 2021. Failure to consult on the aggregates made all the consultations financed by Algihaz *prima facie* unlawful under English common law in respect of Gunning. A letter-before-action has been sent to CWF Ltd by Colne Town Council and Laneshaw Bridge Parish Council making this precise claim, and Mustapha Hajjar has received a copy by email and by recorded delivery to Riyadh.

2. Geology shows Algihaz were unable to assess alternatives

The even more serious problem is that the failure of Algihaz to discover the aggregate problem in November 2021 is strong evidence that Walshaw Moor was not properly assessed as a potential wind farm site even in the simplest matter of geology. This means that any alternatives to Walshaw Moor that might have been considered before 8 April 2026 (when the aggregate problem was finally admitted in print, though a verbal admission was made on 21 May 2025 by Donald Mackay, in a statement beginning “As you can imagine”) cannot have been properly assessed with regard to geology, which is a primary consideration in any civil engineering project. Algihaz were flying blind on geology until they were informed of the problem by WTRG on 17 May 2025, and this shows they were unable to assess alternatives on the simplest matter of geology.

3. Realistic alternatives were required

Alternatives must be considered because Walshaw Moor is an internationally designated SPA and SAC. It is also (unless Algihaz can prove otherwise, and they have failed to supply even an evidence baseline in the PEIR) the statutory setting of the Grade I listed Brontë Parsonage, and in itself a heritage location of world significance. Historic England, who will advise on the heritage question, will also require a clear account of the approach to alternatives.

4. PINS advice on Alternatives

The Planning Inspectorate (PINS) has a series of meetings with CWF Ltd, the development vehicle that Algihaz finance. At the meeting of 15 July 2026, PINS logged the following advice, shown below in a screenshot of the published log.

Environmental constraints and issues	The Inspectorate advised the applicant on the importance of clearly explaining the site selection process, including approach to alternatives, in both the consultation and application documents.
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5. PINS advice postdates the end of the consultation phase despite incompetent extension

The incompetence of CWF Ltd in the matter of email addresses meant that the Statutory Consultation had to be extended by a month to 8 July 2026. A full account of this incompetence will be presented in our third report, which will be a catalogue raisonné of the incompetence thus far of Alghaz and CWF Ltd. The advice from PINS is dated 15 July 2026 beyond the closure of the final consultation. The implication of the advice is that CWF Ltd and Alghaz have not yet clearly explained the approach to alternatives in the consultation documents, but there are not scheduled to be any further consultation documents. The implication is that the process is already deficient in the important matter of alternatives. We advise Alghaz that this advice is highly relevant to the binary gate decision that PINS must make in the 28-day period after submission of the DCO for CEP.

6. Walshaw Moor extreme even among extreme alternatives

Because Walshaw Moor is such an extreme site on the axes of SPA, SAC and statutory world-famous heritage, each of which require a clear account of alternatives considered, it is straightforward to construct a region of the alternatives space from which less-extreme sites might have been selected instead. All the sites in the region are extreme; the point is that Walshaw Moor is extreme even among these extremes. The alternatives space we shall populate will give Alghaz and PINS, a clearer understanding of possible alternatives to Walshaw Moor.

7. The eighteen most extreme sites in England

We list the eighteen sites in England that are as extreme as Walshaw Moor in being both SAC and SPA. We indicate the extent of potentially world-famous heritage on each site.

1. South Pennines Moors SAC UK0030280 SPA UK9007022 *Wuthering Heights* Emily Brontë, *Jane Eyre* Charlotte Brontë, *The Tenant of Wildfell Hall* Anne Brontë, *Remains of Elmet* Ted Hughes and Fay Godwin, *Ariel* and *Crossing the Water* Sylvia Plath
2. Alde-Ore Estuary SAC UK0030076 SPA UK9009112 *The Rings of Saturn* W.G. Sebald
3. Arun Valley SAC UK0030366 SPA UK9020281 possible connection with *The Wind in the Willows* Kenneth Grahame
4. Ashdown Forest SAC UK0030080 SPA UK9012181 *Winnie-the-Pooh* and *The House at Pooh Corner* A.A. Milne
5. Breckland SAC UK0019865 SPA UK9009201 some connection with *The Go-Between* L.P. Hartley
6. Benacre to Easton Bavents SAC UK0013104 SPA UK9009291 *The Rings of Saturn* W.G. Sebald
7. Chesil Beach & The Fleet SAC UK0017076 SPA UK9010091 *On Chesil Beach* Ian McEwan
8. Dungeness, Romney Marsh & Rye Bay SAC UK0013059 SPA UK9012091 *Moonraker* Ian Fleming
9. Dorset Heathlands SAC UK0019857 SPA UK9010101 *The Return of the Native* Thomas Hardy
10. East Devon Heaths SAC UK0012602 SPA UK9010121 some association with *The French Lieutenant's Woman* John Fowles
11. Flamborough & Filey Coast SAC UK0013036 SPA UK9006101 *Dracula* Bram Stoker
12. Minsmere-Walberswick SAC UK0012809 SPA UK9009101 *The Rings of Saturn* W.G. Sebald
13. North Norfolk Coast SAC UK0019838 SPA UK9009031 *The Woman in Black* Susan Hill

14. North Pennine Moors SAC UK0030033 SPA UK9006272 *All Creatures Great and Small* James Herriot

15. North York Moors SAC UK0030228 SPA UK9006161 *Dracula* Bram Stoker

16. The Broads/Broadland SAC UK0013577 SPA UK9009253 *Coot Club* Arthur Ransome

17. Thames Estuary & Marshes SAC UK0013690 SPA UK9012021 *Great Expectations* Charles Dickens

18. New Forest SAC UK0012557 SPA UK9011031 *The Children of the New Forest* Frederick Marryat

8. Walshaw Moor even more extreme than Ashdown Forest, the site of *The House at Pooh Corner*

It is immediate that Walshaw Moor is the most extreme site on the axes of SPA/SAC and world-famous heritage. Its nearest comparator is Ashdown Forest. The heritage claims of the other sites may be strong but do not confer the designation of “world famous literary landscape” that Walshaw Moor and Ashdown Forest both embody. We note that while nobody would ever seriously suggest Ashdown Forest and the “Hundred Acre Wood” as a site for a wind farm, it is not the statutory setting of a Grade I listed building. Walshaw Moor is the most extreme site in England by some distance.

9. Walshaw Moor the most extreme site in the United Kingdom

We conclude that on aspects for which Natural England and Historic England would require clear account of alternatives, Walshaw Moor is the most extreme site in England on which to propose a wind farm. The same analysis can be extended to Scotland, Wales and Northern Ireland and we can similarly conclude that in the whole of the United Kingdom there is no site for a wind farm that is as extreme on the Alternatives axes of SAC/SPA/Heritage as Walshaw Moor.

10. Consequent necessity for the highest standards of clarity on alternatives

Given the proven extremity of Walshaw Moor with regard to alternatives, it is clear that PINS must insist on the highest standards of clarity in the explanation of site selection and the approach to alternatives in both the consultation and application documents. But we have shown in Report 1 that the site selection relative to putative alternatives was made in ignorance even of the simplest matters of geology.

11. PEIR statements on Alternatives are evasive

In order to produce some kind of Alternatives narrative the PEIR resorts to evasive statements of this kind.

5.1.1 In accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the ‘EIA Regulations’) an important part of the EIA process is to describe the reasonable alternatives considered during the evolution of the Proposed Development, such as design, technology, location, size and scale, and to set out the main reasons for selecting the chosen option. As such, this Chapter describes the reasonable alternatives that have been considered, at this preliminary stage of the Proposed Development.

5.5.1 A robust site selection process is being carried out, comprising a number of detailed appraisal stages, to validate the chosen PEIR Boundary for the Turbine Area.

The change in tense from “have been considered” to “is being carried out” will not elude the lawyers and planning experts that Alghaz should now employ, as a matter of urgency, to consider the

position of Algihaz relative to the Planning Inspectorate's advice, and the binary nature (accept/reject) of the decision that PINS must make in the 28-day gate. It is usual to call the response group to an external threat "the red team".

12. Algihaz red team advised to ascertain relationship between Richard Bannister and Christopher Wilson

It may help Algihaz red team in their assessment of their situation to assess the experience of Christopher Wilson at due diligence. We do not know for certain how Christopher Wilson became aware of Walshaw Moor but the point will certainly be of importance now to Algihaz Holding in their unfortunate position and Mustapha Hajjar should seek the truth. It is unlikely that the relationship between Christopher Wilson and Richard Bannister was understood by Algihaz at due diligence because the relationship web of public school Englishmen is a complex matter, requiring a developed understanding of social strata in England, yet Algihaz did not understand the simplest implications of geological strata during due diligence. We advise Algihaz to attain a clear understanding of the social relationship between Christopher Wilson and Richard Bannister, since it may explain to some extent why Algihaz are now financing a wind farm proposal on the most extreme site in the UK.

13. Inexperience of Christopher Wilson a matter of record

The inexperience of Christopher Wilson in renewable energy at the time of Algihaz due diligence in November 2021 is a matter of public record. There follows a list of his appointments.

TWG PIG CO LIMITED Co. No. 04027907 Director 27 July 2000 (Swine farming) Wound up in High Court of Justice and liquidated to pay a debt to Mutchmeats Ltd 17 September 2003.

WILSON AGRICULTURE LTD Co. No. 3099327 Director. This company, given by Christopher Wilson in his application to become a director of TWG PIG CO LTD has no record under the company number at Companies House.

LOWER HOLLOWFIELDS FARM Co. no. 3230742 Secretary 6 August 1996-5 August 2002

INTERGRO LTD Co. no. 05538534 Director 20 September 2007 Compulsory strike off 5 June 2012

TALBOT HOUSE INVESTMENTS LTD Co. no. 07169348 Director 25 February 2010- 13 March 2017

13 MANDELA LTD Co. No. 12009861 Director 21 May 2019 -4 Feb 2020. Residents property management. Dissolved

THE WILSON GROUP & ASSOCIATES LTD Co. no. 07662848 Director 8 June 2011 Compulsory strike off 20 June 2015

THE WILSON GROUP AND ASSOCIATES LIMITED Co. no. 1091296414 Director August 2017-November 2019 Other business support services . Voluntary strike off

WORLDWIDE RENEWABLE ENERGY GLOBAL LTD Co. no. 12259926 Director 14 October 2019. Residents property management. Under first notice for involuntary strike off (following voluntary strike off that was subsequently withdrawn)

ZENITH HOUSING SOLUTIONS LTD Co. no. 12879398 Director 14 September 2020. Dormant company whose stated purpose was renting and operating of Housing Association real estate

TALBOT DEVELOPMENTS LTD Co. no. 09853577 Director 3 November 2015-24 November 2020. Voluntary strike off

GRIFFIN UK HOLDINGS LIMITED Co. no. 11693641 Director 23 November 2018. Development of building projects. Voluntarily dissolved 4 February 2020

SEVERN ESTUARY WIND FARM LIMITED Co. no. 14131859 Director 25 May 2022. Voluntary strike off 5 September 2023

COLNE RENEWABLES LIMITED Co. no. 14939211 Director 15 June 2023. Dormant company, development of building projects

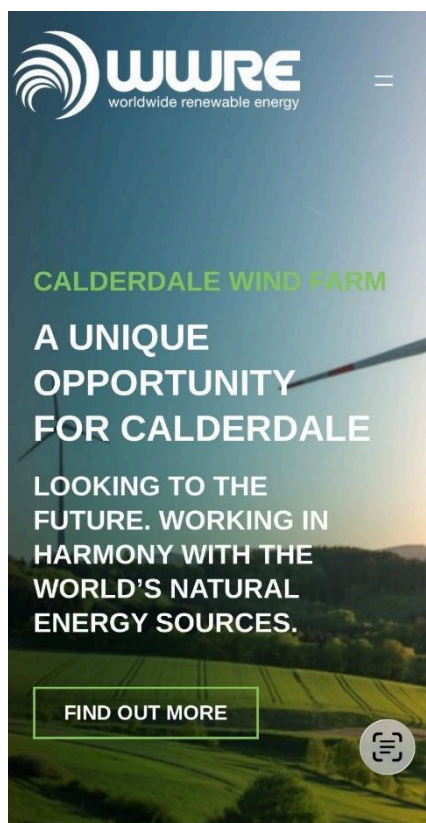
BIRR RENEWABLE LTD Co. no. 14871615 Director 16 May 2023 No filing history available

14. Anomalies at WWRE Global

We shall examine WWRE Global Ltd below because it was the vehicle most directly involved with CWF Ltd; a company with a similar name appeared on the first CWF website. We note that WWRE Global Limited was incorporated on 14 October 2019 and that Algi haz due diligence on Walshaw Moor was concluded by the signing of the land option with the Walshaw Moor Estate and Richard Bannister on 11 November 2019.

It will now be clear to Algi haz that at the time of due diligence, Christopher Wilson the founder and then sole director of CWF Ltd had no experience of wind farm development in the UK. There is no evidence that he had any ability to judge how extreme Walshaw Moor was on the Alternatives axes of SAC/SPA/Heritage. We know that he had none of the necessary understanding of the site geology because Algi haz themselves did not attain such understanding until it was pointed out to them by WTRG on 17 May 2025.

The CWF website was launched in September 2023. As well as its muddled FAQs, it displayed the logo of a company called WWRE.



A link on the CWF website led to the website of a company called WWRE based in Madrid. The logo of this Madrid-based company resembled that of the company called WWRE that was on the CWF website.

15. Funds supplied by Algihaz missing from WWRE Global accounts

As we have seen, in 2029 Christopher Wilson became director of a UK company with a similar name: WORLDWIDE RENEWABLE ENERGY GLOBAL LTD. This was not the company based in Madrid; the registered address of WWRE Global Ltd was in Malmesbury. The Spanish company had made some wind farm investments in 2017, long before WWRE Global was incorporated in 2019. No transactions appear in the accounts of WWRE Global from incorporation to its application to be struck off on 9 April 2026. This is despite the fact that the CWF accounts for the period ending 28 February 2022 state that WWRE Global has been paid £200,998 and still held £114,015. The stated purpose of WWRE Global is “Residents Property Management” an activity congruent with Christopher Wilson’s experience following his time as a failed pig farmer. The £114,015 might have financed the minimal due diligence that would have informed Algihaz of the aggregate problem. Further analysis of this point will be made in our third report for Mustapha Hajjar: *Catalogue Raisonné of Algihaz Incompetence on Walshaw Moor* where it appears in A: *Due Diligence* as document. The catalogue gives a photograph of each document together with expert commentary, and is for legal purposes.

16. Inexperience of Christopher Wilson should concern Algihaz

The demonstrated inexperience of Christopher Wilson as a developer of wind farms relates directly to the question of alternatives. As a rookie, he was unlikely to be in possession any alternative sites. This evidence about Christopher Wilson’s experience relative to the key question of alternatives will be adduced by WTRG as an interested party during examination. The pork farms (one at least of which went bankrupt and was sued by an abattoir) and minor residential property development concerns are unlikely to appeal as a background to the legal and PR teams of Algihaz.

17. 440 Kelvin Volts

An item in the forthcoming catalogue raisonné of CWF Ltd and Algihaz incompetence (which will form our third report for Mustapha Hajjar) should now give the Algihaz technical and legal team considerable cause for misgivings. CWF Ltd published a website from September 2023 until October 2024 which contained this FAQ.

17. How will Calderdale Wind Farm be connected to the Grid? ↓

We already have an offer from the Distribution Network Operator Energy North West to connect into the local electricity network substation at Padiham. Negotiations are also ongoing about an alternative connection via a new substation and that would go into National Grid which would connect into existing 440 KV pylons.

The grid connection and associated infrastructure would be subject to a separate planning application to the wind farm.

In fact CWF was “accepted to connect” at Rochdale, not Padiham and the UK National Grid runs at 400 kV not 440 Kelvin Volts. Only an amateur organisation publishes statements of this kind. Algihaz had failed completely to assess the capabilities of Christopher Wilson at due diligence. Algihaz were investors in an amateur wind farm on the most extreme site in the UK and no retrospective “alternatives” process can erase these origins.

18. Behaviour of Algihaz on Walshaw Moor incompatible with Algihaz mission statement



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Growth and sustainability.

Aljihaz 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, Aljihaz 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.

Christopher Wilson did not have “best-in-class expertise” and had not formed “long-term and trusted relationships” in any relevant field. As a pork farmer, he would not be easily trusted by an abattoir again. CWF Ltd have not exhibited “robust local capability” because they have found Aljihaz the most extreme site in the UK on which to propose a wind farm. Neither “passion”, “dedication” nor “strong partnerships” have been shown in this matter of Alternatives and we advise Aljihaz that on this evidence their DCO proposal is likely to be rejected at the gate. This may be a merciful release for Aljihaz and Mustapha Hajjar, who must otherwise face at least six months of intolerable public humiliation as the proposal’s non-existent alternatives come under examination.

19. Suggestion of Donald Mackay as honest broker

This report confirms the admissions made by several CWF Ltd consultants that the CEP proposal is unusually difficult, and explains why they could not name any sites they had worked on that were as complex than Walshaw Moor. The most convincing witness to the non-existence of alternatives is CWF Ltd consultant Donald Mackay who is held in the highest regard by many who have dealt with him at the public consultations. The following exchange between WTRG and Donald Mackay has been in the public domain since 4 June 2025. Should the Aljihaz red team need frank and trustworthy advice about their parlous position on alternatives, they should contact Donald Mackay.

WTRG: “There’s an idea that the company must consider other sites before developing on peatland.”

DM: “That just isn’t ever how these stories go. Christopher Wilson finds this site and gets some investors interested enough to make a start. Every wind farm is the same.”

Every wind farm is not the same. The vital difference is that reputable wind farms are developed by established companies (SSE, Vattenfall, EDF) with reputations to lose; they have long experience, access to alternatives and always do due diligence. Donald Mackay has simply never worked before for a proposal rooted in such amateurism as Christopher Wilson’s Calderdale Wind Farm. Mackay described the first published iteration of CEP (the 65-turbine layout) as “worse than useless”.

20. Catalogue Raisonné of Aljihaz Incompetence on Walshaw Moor

Better an end in horror than horror without end. Some of what faces Aljihaz Holding at examination, where WTRG will be an interested party, is the subject of our third report, *Catalogue Raisonné of Aljihaz Incompetence on Walshaw Moor* which WTRG will publish on 1 September.

Nick MacKinnon Editor Walshaw Turbines Research Group 14 August 2026

