Date: 10 June 2026

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear [redacted],

Thank you for consulting Natural England under Section 42 of the Planning Act 2008 for Calderdale Energy Park. Please find attached our detailed advice on the Preliminary Environmental Information Report (PEIR).

Overarching comments

Natural England is committed to helping deliver more renewable energy in a sustainable manner which avoids adverse impacts on the natural environment and seeks to contribute to nature recovery, in line with the government's Environmental Improvement Plan (EIP) targets.

We consider that renewable energy development should not be delivered at the expense of the natural environment.

The proposed turbine area is legally protected as a Special Area of Conservation, Special Protection Area and Site of Special Scientific Interest, due to its international and national importance for nature. Natural England's statutory role is to provide advice on the protection of these sites.

The evidence provided in the PEIR demonstrates that the proposed development site is an exceptional area for nature, including internationally important habitats, birds and landscape character.

Baseline surveys show over 100 species of birds and over 1,000 hectares of irreplaceable blanket bog habitat, the key feature of the SAC.

As stated in the Ornithology Chapter of the PEIR, *"the results confirm that the study area represents a high-quality upland ecosystem, supporting extensive, structurally diverse habitats that collectively sustain both specialist moorland species and the broader bird community characteristic of upland England."*

We advise that the quality of SAC baseline habitats and ecosystem functioning have been consistently underestimated in the Biodiversity Chapter, which has influenced impact estimations and led to underestimates of the requirement for mitigation and potential compensation.

The irreplaceable peatland habitats provide numerous ecosystem services, including water regulation and carbon storage.

Natural England has concerns that the potential CO_2 emissions from the destruction and long-term damage of peatlands has not been adequately accounted for in the greenhouse gas emissions

assessment, due to under-precautionary assumptions on factors including peat volume, carbon density, storage, restoration effectiveness, hydrology, and electricity yield.

The evidence shows that the proposed development would have extensive and complex impacts, including (but not limited to):

- displacement, disturbance, collision risk and habitat loss for a variety of bird species.
- destruction and long-term degradation of peatland habitats, leading to loss of biodiversity, damage to peatland ecosystem functioning, and release of CO_2.
- significant effects on Calderdale Special Landscape Area, which has high national value and cultural significance as Brontë Country, and wider effects on four Protected Landscapes and their settings.

Natural England therefore has fundamental concerns with the siting of this proposal and its associated impacts to nature.

Strategy and policy

The Government's Environmental Improvement Plan (EIP) provides a strategic framework for improving the natural environment and includes interim targets for progressing statutory long-term targets set out in the Environment Act 2021. UK peatlands store approximately 3.2 billion tonnes of carbon and construction activities can lead to large, irreversible emissions. The EIP highlights the importance of avoiding carbon loss arising from peat disturbance and includes a commitment to restore 280,000 ha of peatland in England by 2050. Damage and destruction of peatlands for development reduces the overall potential to recover peatland and reach these targets.

The newly published Land Use Framework shows how nature, food production, clean energy and housing can complement each other rather than compete. However, location matters: the Framework focuses on the principle of 'right use, right place' and highlights how more efficient land use means focusing land use change in areas where land is most suitable. It states that *"When targets for development, renewable energy, sustainable farm practices and habitat creation are considered together, our analysis suggests opportunities in England are not uniform… For example, peatland habitat is concentrated in relatively few upland areas... Prioritising restoration in these locations creates multiple benefits."*

Natural England also highlights that the National Policy Statement (NPS) for Renewable Energy (EN-3) states that *"Onshore wind farm sites within England may be proposed on peatland, however applicants should rule out other locations before siting developments on peatland. In particular, areas of deep peat, which have the highest potential for carbon emissions, should be avoided."* However, Chapter 5 of the PEIR does not provide information demonstrating how any alternative non-peatland locations have been identified or considered as part of site selection. We note that Chapter 5 includes the 'key considerations' that will be followed in the full Site Selection Report; however, we consider some of these criteria to be unnecessarily restrictive and advise that alternative sites should be explored beyond these parameters.

Natural England's new Strategy sets out how recovering nature will be a vital pillar to help deliver the infrastructure that the country needs. In line with this Strategy, our teams work collaboratively with developers across the country to deliver renewable energy projects which achieve the best outcomes for nature.

Natural England supports the delivery of well-sited renewable energy projects which also contribute to nature recovery. However, in this case, the siting of the proposed development poses significant challenges with aligning with relevant environmental legislation and policy requirements.

Engagement and amendments

We welcome the engagement with your team at the pre-application stage to discuss evidence requirements and explore potential approaches to avoidance and mitigation.

Natural England notes that the proposals have been amended from 65 to 34 turbines, and the Battery Energy Storage System (BESS) and solar panel elements have been removed.

The baseline surveys show that the site is predominantly deep peat and, although the peat depth surveys have informed some changes to turbine locations, large amounts of infrastructure (including access tracks, cabling and turbines) remain located on deep peat.

Based on the information provided in the PEIR, it is clear that it would not be possible to avoid or effectively mitigate impacts in this location, due to the nature of the development and the high sensitivity of the entire site.

Although these changes have reduced some localised impacts, the overall impacts remain extremely high.

Compensation

The PEIR documents demonstrate widespread potential adverse effects for biodiversity, peatland habitats, birds, hydrology and landscape.

Natural England has concerns regarding the technical and ecological feasibility of effectively compensating for the scale and complexity of irreplaceable habitat loss, bird impacts and changes to wider ecosystem functioning associated with this proposal.

It is not possible to create blanket bog. Blanket bog is recognised as an irreplaceable habitat, as it takes thousands of years to form and is dependent on specific climatic and hydrological conditions for its development. At an international scale, blanket bog is considered globally rare (20% lies in Britain and Ireland). It is one of the few natural habitats for which GB and Ireland are internationally important. Existing peatlands have policy and legislative protections, including the EIP target for restoration. There could be double counting if applicants seek to compensate their impacts through restoration of sites that will otherwise be restored through other initiatives.

The breeding bird assemblage is diverse and requires a range of specific habitats and conditions. The ability to recreate such an extensive area of complex upland habitat mosaic that will perform the same function and have the ability to support a similar diversity and density of upland breeding birds is not considered possible in any realistic timescale. There are also existing Environment Act targets on reducing the risk of species extinction.

Therefore, Natural England advises that we consider it will not be possible to agree effective measures that adequately compensate for the effects of this development.

Overall, Natural England considers that these issues are likely to be insurmountable in our engagement with this application and compliance with the Habitats Regulations.

Natural England will continue to engage with your team on progressing outstanding issues, in line with our statutory role. We would welcome Expert Topic Groups with relevant consultees, including the Environment Agency. However, we do not expect it will be possible to reach agreement on key issues.

Please refer to our attached letter for detailed advice.

Please send all future correspondence regarding this case to consultations@naturalengland.org.uk.

Yours sincerely,

Yorkshire and Northern Lincolnshire Area Team
Natural England