

CALDERDALE ENERGY PARK'S PUBLIC CONSULTATION ENDS AT MIDNIGHT ON WEDNESDAY 10 JUNE

It's really important that as many people as possible respond as when (if!) CEP make their Development Consent Order (DCO) application they have to summarise the feedback they receive and detail how they have responded to it.

You can respond by going to <https://www.calderdaleenergypark.co.uk/have-your-say/> where there is an online form that you can complete, or you can write to CEP at Freepost CALDERDALE ENERGY PARK (this is the full address, and you don't need a stamp).

We think there are four main issues which can be summarised as Birds, Blanket Bog, Brontës and Traffic. We've chosen four points that can be made about each of them.

Feel free to pick any or all of them, or of course something else entirely. It's best to use your own words because stock responses carry less weight. We have given the references in the Preliminary Environmental Information Report (PEIR) that CWF Ltd published for the Statutory Consultation. We have given some evidence in each point, but much more is given in the Stronger Together Response to the PEIR which you can view [here](#) The italicised evidence comes from the developer's own [PEIR](#).

BIRDS

- Walshaw Moor is in the middle of an internationally designated Special Protection Area. The PEIR found 107 species, including 69 of legislative or conservation importance. *“The South Pennine Moors Phase 2 SPA is designated for its internationally important bird populations and upland habitats. As the majority of the Proposed Development lies within the SPA, there is potential for direct and indirect effects, including habitat loss, disturbance, displacement and death/injury of qualifying species. Furthermore, the study area supports approximately 10 – 14% of the SPA’s breeding golden plover population, 11 – 18% of the SPA’s breeding merlin population and notable populations of the recognised assemblage species, making it integral to maintaining this population. The SPA is of international importance.”*(PEIR 9.8)
- The proposal would fragment the SPA because the turbine area is right in the middle. The PEIR notes the importance of this integrity. *“9.5.38 Overall, the non-breeding bird assemblage recorded between 2022 and 2024 demonstrates that Walshaw Moor forms a high-quality upland habitat complex. It supports key populations of upland waders and raptors during migration and winter and contributes to the broader ecological connectivity of the South Pennines SPA and SSSI.”*
- Walshaw Moor is a wonderland for many species. Curlews are in terminal decline in most of the UK and will be extinct as a breeding species in Wales by 2033. The Curlew

Wales action plan to save them includes excluding wind turbines from areas with more than five breeding pairs. On Walshaw Moor, curlew densities are probably the highest in Europe, and the PEIR observes strong growth and 44 pairs in 2025. This success story will be destroyed by the construction and operation of CEP. Merlins are red-listed falcons about the size of a blackbird, ground-nesting, and they thrive on Walshaw Moor because of the abundance of prey and relative safety from egg and chick predation. *“PEIR 9.9.109 The operational disturbance/displacement effects on merlin would be adverse, direct and indirect, potentially permanent, long-term, frequent of a large impact magnitude and, therefore, there would be a likely significant adverse effect at the national scale.”*

- The totality is even more remarkable than the species success. PEIR 9.5.32 says *“The combination of diverse habitat types, effective predator control, limited disturbance and well-managed vegetation structure has resulted in an area that supports one of the most complete upland bird assemblages in the South Pennines. Populations of SPA/SSSI species remain stable, while a wide range of raptors, waders, owl and passerines also breed successfully. The results confirm that Walshaw Moor 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.”*

BLANKET BOG

- Walshaw Moor is a Special Protection Area because of its peatland. There are areas of deep peat spread across the site of the proposed wind farm. Some of the peat has been growing since the Bronze Age at a rate of 1mm per year. Peatland in the UK stores more CO₂ than our forests. Left alone, peat is a carbon sink and the active bog it supports continues to remove CO₂ from the atmosphere. But once peat is disturbed, say by the construction of a massive industrial complex such as a wind farm, it emits CO₂ it has been storing into the atmosphere. The developers intend to open borrow pits on the moor to extract a low grade aggregate available as a waste product at every quarry in West Yorkshire and Lancashire. The true purpose of the borrow pits is to create voids that will be used to dispose of excavated peat which if exported would be classified as industrial waste. This is described as re-instatement of borrow pits that did not need to be opened in the first place, because they cannot supply the strong stone needed for the tracks and concrete (PEIR 22.5.9).
- Walshaw Moor is a major catchment. Storms over Walshaw Moor have led to multiple catastrophic floods in the Calder Valley. Relatively small changes in vegetation management on Walshaw Moor have caused disproportionate changes in the peak flow rate that floods the valley. CEP is a massive change in the hydrogeology of the whole catchment. The minimum requirement should be to show that CEP would not increase peak flow rate. Instead, the developers admit that they cannot predict their own runoff. PEIR says this: 10.8.99 *“The potential flood risks associated*

with the operational stage include an increase or change in flood risk, specifically due to changes in ground levels or uncontrolled discharges of surface water from new impermeable areas / the drainage network. There is no specific quantitative methodology that allows flood risk effects to be assessed."

- The sole access to the site is over Crow Hill, which has a cluster of eight major peat slides and bog bursts, a density as great as any place in the UK. The PEIR wrongly gives the impression that mass movements of peat on Crow Hill are historical ("over 200 years ago") but failed to discover the huge peat slide on Crow Hill in 1989, which is described in one of the PEIR's own major references (Ross, 2020) on p 68, and photographed in another reference (Warburton & Dykes, 2007). The PEIR gives maps of peat slide and bog burst likelihood (10.4.12, 10.4.13 of Appendix 10-4) and shades the Crow Hill track falsely green and dark green (low and very low likelihood) though the PEIR admits that no peat survey has been made here, so assessment is impossible and the maps are scientific fraud. Others have surveyed the track and found peat depths of up to 230 cm, making the sole access track by far the most unstable and dangerous place in the proposal, even without allowing for the Crow Hill peat slide cluster.
- The other wind farms in the South Pennines are relatively flat sites with floating tracks. CEP is steep and many of the turbines can only be reached cut-and-fill tracks which involve total removal of deep peat. The trenches are filled with aggregate, forming massive French drains that dry the whole moor. CEP requires unusual and disproportionate destruction of deep protected peat to achieve the total power the developers want because it was a poorly chosen site.

BRONTËS

- The Brontë sisters are writers of world significance and Walshaw Moor is the Brontë Moor. No other landscape in the UK has the same intense and compact relationship with British people of genius as Walshaw Moor. CWF Ltd have published no evidence on this matter in the PEIR.
- Brontë Country was first named in 1885 as the identity of the huge area ringed by Burnley, Brierfield, Nelson, Colne, Cowling, Cross Hills, Steeton, Keighley, Bingley, Saltaire, Shipley, Bradford, Halifax, Mytholmroyd, Hebden Bridge, Todmorden, and Cornholme. At the centre of Brontë Country is the Brontë Moor which is the shared community asset of a million people in Lancashire and West Yorkshire whose communities are re-inventing themselves after the collapse of textile manufacture in the 1970s. The Brontë Moor also lives in the imaginations of people all over the world.
- When the King's Bradford Pennine Gateway was opened in 2025, the Government said this about it: "*Brontë Country to become country's newest National Nature Reserve. The new National Nature Reserve – the 7th in the King's Series - announced*

and created today (13 May) is the first of its kind in West Yorkshire and will provide people with opportunity to enjoy the landscapes that inspired and were celebrated by the Brontë Sisters.” The King’s Gateway is described by Natural England as “*of national importance*” (and by Conde Nast Traveller magazine as one of seven Wonders of the World for 2026) and is a gateway to the wildlife and heritage wonderland of the Brontë Moors which will be destroyed by Calderdale Energy Park.

- In particular, Top Withins is the location of Wuthering Heights and Walshaw Moor is where Cathy and Heathcliff played truant as children. The classic approach from the Brontë Parsonage via the Brontë Bridge, which people come from all over the world to experienced, will be dominated by wind turbines which the developers have tried and failed to hide.

TRAFFIC

- Until the geological facts were pointed out to the developers on 17 May 2025, CWF Ltd assumed, and said in writing, that the wind farm would be constructed using the onsite stone. This is the usual method for all the large Scottish and Welsh wind farms. As every reputable builder in Lancashire and West Yorkshire knows, and as is printed on the British Geological Survey Map 77 (Huddersfield): “In general, the sandstones are too weak, porous, and susceptible to frost damage for them to be used for good quality roadstone or concrete aggregate. They may be used in road construction below the level of possible frost damage and for some of the less demanding concrete applications.” The proposal started on 11 November 2021, when an agreement was signed by Richard Bannister and Al Gihaz Holding. It took until 8 April 2026 for CWF Ltd to announce that 616,000 tonnes of granite (or other hard stone) must be imported to the site to build the tracks and that 77000 tonnes of concrete aggregates will also have to be imported. There have been three public consultations (September 2023, April 2025, September 2025) about a wind farm on Walshaw Moor and none of them mentioned this vast tonnage of imported stone.
- The latest Statutory Consultation (April 2026) also fails to consult communities about the vast stone deliveries (61600 HGV movements for the track stone and 7700 for the concrete stone.) This is because the PEIR traffic assessment (Appendix 14-1 Tables 10 and 11) has an unjustified assumption that 70% of the granite will be delivered by rail to Horton-in-Ribblesdale in the Yorkshire Dales National Park and then brought in trucks through the dales to Laneshaw Bridge (PEIR 22.5.9 Footnote 48) via Helwith Bridge, Settle and Kelbrook. This assumption is completely unrealistic. Horton rail link was re-opened to get lorries off the Dales roads by exporting the limestone by rail. There is no chance at all of planning permission being given by YDNPA to subvert the purpose of the rail link with granite imported into the dales by rail and exported by lorry, 20 tonnes at a time.
- CWF Ltd must admit that all the stone will come to Leyland in Lancashire by rail and be delivered from there to the site along the M65 into Colne and Laneshaw Bridge.

On the PEIR's own figures, this will increase the HGV traffic at Boundary Mill in Colne by over 16% and on the A6068 at Laneshaw Bridge by over 20%. Nobody in Colne or Laneshaw Bridge has ever been consulted about this significant matter but the law requires that public consultations allow "intelligent consideration" of the proposal under the [Gunning Principles](#). The consultations have been unlawful.

- There is a significant conflict of interest for Richard Bannister, owner of Walshaw Moor, Boundary Mill in Colne, and the crucial strip of moor up Crow Hill that allows CWF Ltd access for all the stone deliveries and turbine components. CWF Ltd should state explicitly that the reason for the completely unrealistic suggestion of Horton as a rail head was not an attempt to divert 70% of the stone deliveries away from their landowner's Boundary Mill; show that any revised transport plan has not be determined by commercial agreements between Richard Bannister and Al Gihaz Holding; and that they will now run lawful public consultations into the proposal on the models of the Non-statutory, Scoping and Statutory consultations, this time setting out the stone delivery consequences so that the public can give the proposal "intelligent consideration."