



Upper Calderdale Wildlife Network

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The House of Lords
Westminster

23rd June 2025

Support for our amendments to Ban Wind Farms on Protected Peatland in England

I understand the second reading of the Planning and Infrastructure Bill is to take place on the 25th June and I am writing to you with reference to that, on behalf of the Upper Calderdale Wildlife Network.

We are part of a wider campaign group in West Yorkshire who are campaigning to get additional amendments added to the Planning and Infrastructure Bill in order to protect irreplaceable peatland habitats from mismanagement which would damage their ecological integrity and capability to act as effective carbon stores. This mismanagement includes the construction of large wind farms and battery energy storage systems.

We are hugely concerned about proposals for a major wind farm development on the Walshaw Moor in the South Pennines above Hebden Bridge and Haworth in West Yorkshire. Developers, Calderdale Wind Farm Ltd (CWFL) are proposing to construct what could become England's largest onshore windfarm with up to 41 turbines at a height of up to 200 metres. We believe this scheme would be hugely damaging to the triply protected peatland habitats on Walshaw Moor, which is designated as an SPA (South Pennine Moors Phase 2 Special Protection Area), SAC (South Pennine Moors Special Area of Conservation) and SSSI (South Pennine Moors Site of Special Scientific Interest).

As far as we are aware, Walshaw Moor is the first place in England where a large windfarm is proposed on internationally designated irreplaceable blanket bog, but we fear if this application gets approval, then protected peatlands across England will be highly vulnerable to such development.

We are pleased that Government has increased protection for peatlands in its planning reforms, but we are worried that these are far from watertight, because of a loophole in the legislation that allows Critical National Priority low carbon infrastructure projects to be considered “Wholly exceptional” enabling the Secretary of State to override these protections.

Our two proposed amendments to the Planning and Infrastructure Bill would secure protections for designated peatland habitats by applying the precautionary principle.

One amendment would exclude protected peatland in England as a permissible site for the development of wind farms or energy parks, the other would reserve protected peatland in England for restoration without any windfarm or other development.

We believe these measures are vital for achieving the Governments interdependent goals of net zero and nature recovery and represent a win – win for nature and Clean Power 2030. An RSPB study last year showed that England has plenty of suitable areas for wind farms not on protected peatland, for the government to achieve its Clean Power 2030 target for onshore energy.

Our proposed amendments are:

First proposed amendment - To exclude protected peatland in England as a permissible site for the development of wind farms or energy parks

Which Clause would it amend?

Part 2, Planning, Chapter 2 Spatial development strategies, Clause 52 12D Contents of spatial development strategy, Page 81(pdf)/73(printed version) , line 13, at end insert –

“(4.1) A spatial development strategy in England must - (a) list any protected peatland (SSSI, SPA or SAC) in the strategy area; (b) Exclude any and all areas of such protected peatland as a permissible site for the development of wind farms or energy parks”

Rationale

The amendment would strengthen the Government’s existing protections for peatland in its planning reforms and policy statements - particularly the Department of Energy Security and Net Zero’s April 2025 proposed updates to Energy National Policy Statements EN 1 and EN 3. The protections are incomplete by virtue of the Imperative Reasons of Overriding Public Importance loophole. (More information in Appendix 1, Section 2)

Second proposed amendment - To reserve any and all protected peatland in England for restoration without any windfarm or other development

Which Clause would it amend?

Part 2, Planning, Chapter 2 Spatial development strategies, Clause 52 12D Contents of spatial development strategy, (11) Page 82 (pdf)/74 (printed copy), line 7, at end insert–

“(11A) Any and all protected peatland in the strategy area must be reserved for restoration without any windfarm or other development, regardless of peat depth in line with Natural England’s new Definitions of Favourable Conservation Status for Blanket Bog and Heathland, that clarify:

- **Blanket bog may occur on peats shallower than 0.3 m, especially upon the periphery of blanket bog masses.**
- **Areas of shallower peat will often support blanket bog vegetation and should also be regarded as blanket bog and an integral part of the hydrological unit of the peat mass or body.”**

Rationale

This amendment aims to secure mutually interdependent biodiversity and climate benefits in areas of protected peatland, which will not be obtainable if development takes place on it.

I attach our information pack which gives more detail about our proposed amendments.

We wonder if you would be interested and be able to propose our amendments to the Bill in the House of Lords, and if you are, we would love to hear from you as soon as possible.

Yours sincerely

Penny Price

On behalf of the Upper Calderdale Wildlife Network