

From Nick MacKinnon (Editor) WTRG
 Upper Heights Farm, Stanbury, BD22 0HH
 01535 649359

nipmackinnon@gmail.com

To: Christian Egal (Project Director); Christopher Wilson (Executive Chair); Ghazi Osman (Director of CWF Ltd) Katherine King (Planning Inspectorate)

Material errors in the PEIR for Calderdale Energy Park

I am writing formally to notify you of material geospatial errors in the PEIR layout presented for Statutory Consultation. The errors are so elementary and fundamental that they indicate extensive delinquency in the whole PEIR, which should be withdrawn, subjected to proper checking throughout, corrected, and published again as version 2. Since the present PEIR contains a great deal of evidence about systemic failures by CWF Ltd and their consultants Logika, it must be retained pending a possible judicial review of the planning process for CEP. We suggest that the loose-leaf binders in use at the public exhibitions would be a reliable evidential archive for legal purposes.

The co-ordinates of the turbine locations are given in the table 4-1 of the PEIR in section 4.3.3.

A detail of the table is shown below to establish nomenclature.

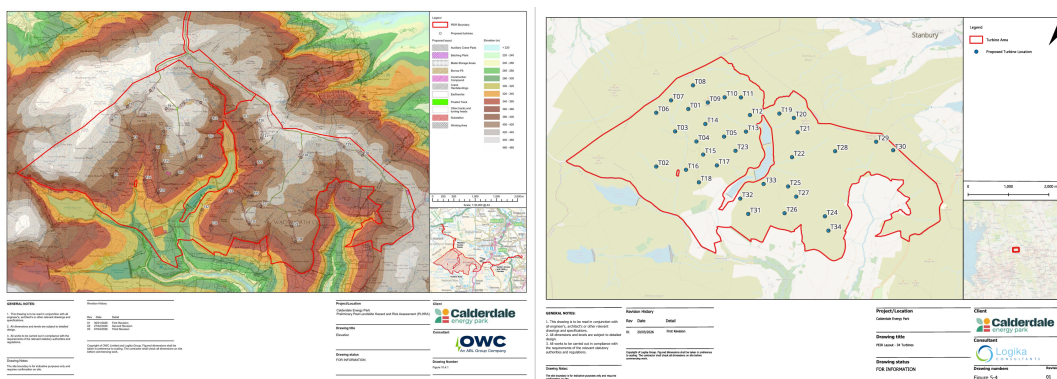
Turbine Number	Easting	Northing	Top of Foundation Height AoD (m)	Tip Height (m)
T01	394796.000	435048.000	417.480m	200
T02	394026.960	433609.293	390.789m	200

Section 4.3.3 of the PEIR states:

“The indicative turbine locations identified at this stage, and used for the preliminary assessments presented in this PEIR, are provided in Table 4-1. These locations are subject to further refinement following the results of further surveys and assessment and details will be provided in the ES.”

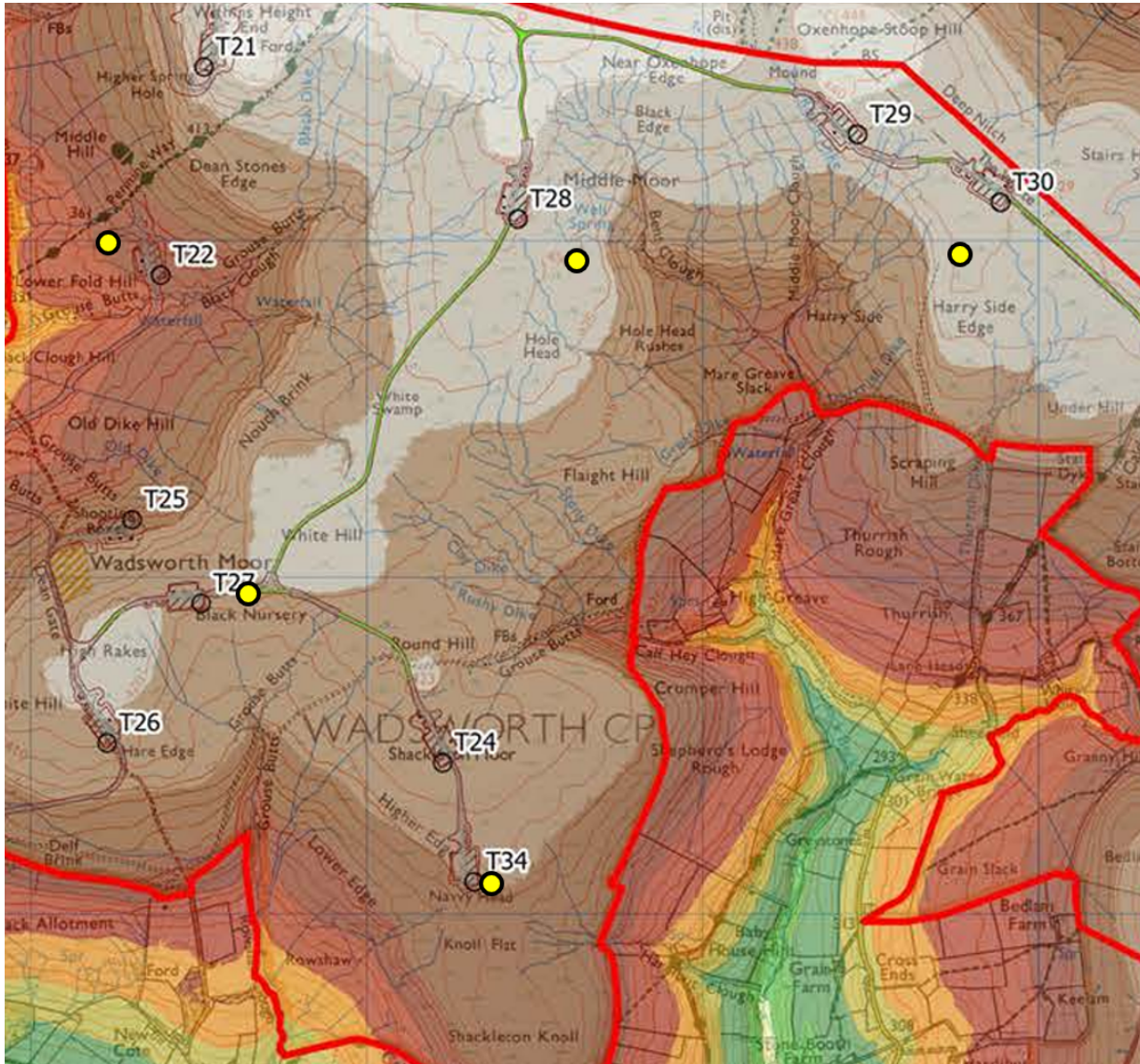
The co-ordinates of the turbine locations in three dimensions are given to millimetric accuracy because the eastings and foundation heights are given to 3 decimal places. It is these co-ordinates that the Statutory Consultees use for their work on the PEIR.

The PEIR contains many maps including a set of maps with high precision engineering drawings of the infrastructure. An example, figure 10.4.1 is shown below. There are also maps with lower precision showing the layout. An example (fig 5-4) is shown below.



These, and many other maps, do not correctly represent the geospatial data given in table 4-1. The largest discrepancy between the maps and the geospatial data is over 220 metres at T28.

The errors are considerable in the turbine area east of the Walshaw Dean Reservoirs. Our map below plots the geospatial positions given in Table 4-1 using a yellow dot in a black boundary.



Variation between geospatial Table 4-1 and the geospatial map 10.4.1. The yellow dots are the positions of the turbines as given in Table 4-1. The black circles are the mapped positions. The maximum error is 220 metres at T28.

The error at T22 impacts analysis of the proximity of T22 to the Pennine Way. The distance of the correct position (yellow dot) from the Pennine Way is 71 metres, which means the blades of the candidate turbine (Vestas 7.2/160) used for modelling noise in the SR, for example would oversail the national trail. A safe setback would be tip height plus 10% which is 220 m.

The error at T30 impacts calculations of the visual dominance of T30 over the King's Bradford Pennine Gateway NNR at Penistone. It is not known if the wire diagrams provided in the PEIR use the correct coordinates.

Peat slide analysis of the ground under the track to T22 cannot be checked because of the 175 metre error in the position of T22 in the maps of Factor of Safety in Appendix 10-4.

Given the vast weight of maps listed below, it would be easier for CWF Ltd to bring Table 4-1 into line with the maps rather than vice versa. The Statutory Consultees cannot be expected to double guess this matter. The statement of the PEIR is that the Table 4-1 is primary, and statutory consultees must use the table to do their analyses or they are reduced to estimating turbine locations from maps that are wrong.

The following maps in the PEIR are significantly at variance with the geospatial data of Table 4-1 of the PEIR, with an error of up to 220 metres. The list is indicative not comprehensive and gives an indication of the range of Statutory Consultees who might be misled by the disjuncture between canonical Table 4-1 and the maps.

4-1 Construction Phase Infrastructure	10-09 Hydrological Features
4-2 Operational and Maintenance Phase	10-10 Peat probe depths
5-4 PEIR layout	10-11 Estimated Peat Depths
10-02 Hydrological Setting	10-12 Hydrogeological Regime
10-03 Water Framework Directive	10-13 GWDTEs
10-04 Designated Sites	10-14 Flood Alert and Warning
10-05 National Soil Map	10-15 FMfP
10-06 Peaty Soils	10-16 RoFSW PD
10-07 Superficial Geology	10-17 Reservoir Risk
10-08 Solid Geology	

Appendix 10-4 Preliminary Peat Landslide Hazard Risk Assessment

Appendix 10-4 has serious errors of fact in the analysis, with evidence of corner cutting and other delinquencies in the use of references that document catastrophic peat slide risk on Crow Hill. These delinquencies will be the subject of a second notice if the PEIR is not withdrawn for significant corrections and an indication given to WTRG that the errors in 10-4 are understood acknowledged and that disciplinary steps against OWC have been taken.

The errors in Table 4-1 were discovered by Nick MacKinnon while preparing the notice on these serious errors of fact, and possible delinquency of OWC with regard to evidence of peat slides on Crow Hill. This alleged delinquency, if upheld by a CWF Ltd inquiry, would be in spite of the clear account of the matter given in the Scoping Responses of Stronger Together, which should be used, and acknowledged, as the reference to the 1989 peat slide. And which were written by Nick MacKinnon of WTRG

On 21 January 2026, the Planning Inspectorate logged their “encouragement” of “positive collaboration” with Nick MacKinnon of WTRG and other members of the campaign group Stronger Together, and this positive collaboration is expected with regard to this notice and with regard to the enquiry into the possible delinquency of OWC in the analysis of Crow Hill peat slides.

If the PEIR is withdrawn, Nick MacKinnon will of course offer to work in positive collaboration with CWF Ltd in the investigation of OWC's alleged behaviour since the management team of CWF Ltd has proved incapable of detecting the errors unaided.

The errors of fact in Appendix 10-4 are much serious even than the discrepancies in the geospatial locations of the turbines, not least because they indicate delinquency of responsibility in the authors of 10-4, of Logika who compiled the PEIR and of the members of the CWF Ltd team who checked the analysis of 10-4. However, the PEIR should be withdrawn, and the geospatial co-ordinates must be corrected first, because inaccurate turbine locations have a major effect on the work of multiple Statutory Consultees.

The turbine location errors also affect the use of the following maps in Appendix 10-4 which relate to peat slide risk on Crow Hill.

10.4.8 Factor of Safety

10.4.9 Factor of Safety (Crane Loaded)

10.4.10 (Source zones Indicative Flow Routes) This map of the flow route of possible land slides within the turbine area has a turbine T35 in a 34-turbine proposal and is further evidence of poor checking of the PEIR contents.

History of CWF Ltd errors-of-fact

We have documented the long series of errors-of-fact made by CWF Ltd in their publications. The list is indicative of a systemic problem of carelessness.

A statement that the National Grid runs at 440 Kelvin Volts and that the proposal was accepted to connect at Padiham when in fact it was Rochdale. (September 2023-October 2024)

80% of the Launch Day Maps had to be corrected after notification by WTRG. (29 April 2025)

The CEP Scoping Report has 16/76 road numbers wrong; a section on the Kelvin, Water of Feuch and Black Dean, none of which are Pennine rivers; a hydrology map with eleven serious errors including two missing tunnels and six misnamed watercourses; this map also had no relief shown.

The errors we have documented and notified here, and in a second withheld notification pending a proper treatment of the first, were found during our first week of analysis since publication. Given the remarkable history of errors-of-fact by CWF Ltd in all their publications to date, it is most unlikely that other significant material errors will not be found in the PEIR when we examine the other chapters and appendices. **In short: if the simple spreadsheet of turbine locations is wrong, then everything has to be checked.**

We recommend the PEIR is withdrawn and the Statutory Consultation is suspended until CWF Ltd have revised the whole PEIR with reasonable care. The public meetings that have been held so far at Denholme, Oxenhope and Hebden Bridge should be re-run on the basis of a PEIR that CWF Ltd have revised with reasonable care. All Statutory Consultees should be informed of the errors. The public who have been sent brochures should be sent an acknowledgement of the errors in the turbine locations and an indication of which information is reliable: the millimetric turbine locations or the maps.

Nick MacKinnon

Editor Walshaw Turbines Research Group (21 April 2026)