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Our Ref : 26/01301/NSIP

8 June 2026

Dear Christian Egal

Proposed Calderdale Energy Park Statutory Consultation on proposed application for development consent Section 42(a) and (b) of the Planning Act 2008 The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ("the 2017 Regulations")

Detailed below is the response by Bradford Council's Local Planning Authority to the statutory consultation received by e-mail on the 9 April 2026, for which you seek comments from Bradford Council by the 10 June 2026.

Our response is primarily to the contents of the Preliminary Environmental Information Report (PEIR), noting the missing elements and the matters which we consider need further consideration. However, we do offer some commentary on the Statement of Community Consultation (SoCC) document.

The Council must also place on record its concern regarding the lack of meaningful, iterative, or structured pre-application engagement leading up to this statutory consultation.

Government guidance and the Planning Inspectorate's (PINS) advice notes explicitly state that the NSIP regime is a "front-loaded" process. We understand that host LPAs are intended to be technical partners, co-designing the evidence base and methodologies well before a PEIR is published. To date, the engagement with the Council has been primarily passive, restricted to a consultation on the draft Statement of Community Consultation (SoCC) and a request for a long-list of planning applications within set parameters of the project.

Bradford is a host authority for the cabling through Bradford and to Bradford West Substation, but there are also other fundamental impacts on Bradford District as the main project area abuts the Bradford border and will have significant impacts on the Bradford's important and historic landscape, biodiversity, it's historic towns and villages, and tourism.

Bradford has not been invited to, or has asked to be party to, events/meetings organised by yourselves, such as technical working groups, agreement on EIA methodologies, raw data sharing, "sifting" exercise for cumulative impacts, options or appraisals of alternatives.

We have also not been offered any Planning Performance Agreement (PPA) to assist in resourcing the Council's planning and specialist teams. Given the scale of this NSIP, it is an industry-standard expectation under the "front-loaded" process that the Developer proactively provides the financial means to support host local authorities. The extensive materials presented within this Preliminary Environmental Information Report (PEIR) have severely strained the Council's internal capacity. It is now evident that any further engagement with this NSIP process requires a robust PPA operated on a full cost-recovery basis, as permitted under Section 93 of the Local Government Act 2003, or via the statutory cost-recovery mechanisms for prescribed public authorities taking effect on 8 June 2026 under The Infrastructure Planning (Fees) (Amendment) Regulations 2026.

We consider that by bypassing collaborative engagement, with Bradford Council as noted above, and relying on a passive website upload, means the burden of basic baseline verification has been restricted to this current formal consultation period. We are of the opinion that this undermines the purpose of a PEIR, which should be a reflection of a largely agreed baseline, focusing instead on refining mitigations.

As a consequence of this approach, the Council's chapter-by-chapter response (detailed below) identifies gaps in baseline data, flawed methodologies, and unaddressed localised impacts. Many of which we consider could have been resolved months ago through standard technical dialogue.

We should note that given the lack of front-loaded engagement to date with Bradford Council, we will respond accordingly to the formal Adequacy of Consultation Representation to the Planning Inspectorate at the submission stage.

Statement of Community Consultation (SoCC)

Whilst we acknowledge that the procedural requirements under the Planning Act 2008 regarding the 28-day review period have been met, we consider that the execution of the consultation is substantially inadequate.

Our primary grievance concerns the introduction of unexpected errata and technical corrections to the Preliminary Environmental Information Report (PEIR) suite on 24 April 2026 and 7 May 2026.

Additionally, on the 22 May 2026 an Ornithology report (referenced Appendix 9.2) was

shared with Calderdale Council (but not Bradford?) and although it is acknowledged this is a confidential report, it was only shared with the one host LPA at a late stage, the impact on ornithology is within Bradford too. Withholding this document from the statutory consultees until this late stage provides inadequate time for specialist consideration.

By issuing these mid-consultation updates and late Ornithology report, we consider that it has fundamentally compromised the integrity of the process. It is questionable there has been a fair consultation, as accurate, stable data has not been provided from the outset.

We consider the introducing vital technical corrections as late as 22 May 2026, it has effectively reset the consultation baseline. Forcing the community and our internal specialists to review, digest, and respond to these newly modified documents within a truncated window.

Furthermore, this "moving target" information delivery compounds the barrier to physical information access. It is not clear if hard copies provided to the community have been updated and if not, there is potential for unfair and discriminatory reliance on digital-only updates for digitally excluded populations.

We would suggest the consultation exercise is re-run to allow a full, uninterrupted 9-week period of consultation.

Preliminary Environmental Information Report (PEIR)

Overall concern

We are concerned the project layout parameters and localised baseline survey data for the grid transmission system (i.e cabling route) within Bradford District are missing. The documentation openly admits that the Bradford West Cable Corridor "*remains undecided*" and that "*detailed route information is not yet available*".

We are not able to identify field-verified environmental, geological, or archaeological baseline surveys that have been conducted along the cable corridor within the Bradford District. The omission of localised field surveys and definitive layout parameters along the grid transmission route in Bradford represents a direct failure to comply with the instructions set out in the Planning Inspectorate (PINS) Scoping Opinion of October 2025. The scoping opinion requires a whole-development assessment, and the operational cable corridor impacts have clearly been scoped in by the Planning Inspectorate.

The Planning Act 2008, and the Infrastructure Planning (EIA) Regulations 2017, note that a PEIR must provide the "information reasonably required" for a host authority to intelligently assess the likely significant environmental effects of a development, and this should be for the **whole** project.

By presenting unverified desktop assumptions and deferring physical field surveys to a later stage, we consider it has created a systemic data void that invalidates the assessment thresholds and significance conclusions across all the chapters.

Furthermore, the cartographic information presented to the public is deficient. While drawings exist to show the Bradford West Cable Corridor, the scale is completely inadequate for this pre-application consultation. We are aware that you provided GIS shape files on your consultation website, but this is inaccessible to the public and is considered a failure of transparent consultation.

Overall, we consider the PEIR consultation fails the test of allowing for intelligent consideration of the project's impact, particularly for matters related to the cabling route within the Bradford District.

PEIR - comments specifically to each chapter of the PEIR

(NB: we have primarily noted the omissions/issues with these chapters and specialist in house consultee responses are in a format as submitted to the LPA)

Chapter 1: Introduction

As noted above this Chapter explicitly confirms that the exact route of the Bradford West Cable Corridor *'remains undecided and a level of flexibility is sought'* and that *'detailed route information is not yet available'*. This is a primary concern for Bradford as a PEIR should contain information that *'is reasonably required for the consultation bodies to develop an informed view of the likely significant environmental effects of the development'*.

We consider it represents a direct failure to comply with the explicit directives of the Planning Inspectorate (PINs). It is actively ignoring PINs' instructions, and we consider it is presenting abstract desktop cabling corridors instead of field-verified data.

Chapter 2: Environmental Impact Assessment

There are concerns that this chapter contains a number of contradictions that invalidate the legitimacy of the pre-application stage.

Paragraph 2.2.1 of Chapter 2 establishes that a legally robust EIA process requires that *'the data informing the assessments is adequate'*, while Paragraph 2.2.11 defines the statutory purpose of the PEIR as enabling consultees to *'develop an informed view of the likely significant environmental effects'*

The commentary then goes on to note within Paragraph 2.2.13, that that because *'detailed route information is not yet available'* and *'environmental surveys are also ongoing,'* the technical assessments for the Bradford West Cable Corridor cannot follow a standard draft ES format.

As noted above, the Planning Inspectorates overarching comments in the Scoping Opinion, mandate that the baseline must be proportionately based upon up-to-date survey work for the ***'whole of the proposed development,'***

By launching a statutory consultation with an acknowledged baseline survey void, we consider that the consultation is on an abstract concept rather than an infrastructure layout. Deferring physical field baseline surveys to a post-consultation phase subverts the statutory pre-application window, rendering Table 2-1 (Environmental Factors Matrix) as misleading and arguably non-compliant under Regulation 12 of the EIA Regulations 2017.

Chapter 3: Description of the PEIR Boundary and Surrounding Area and Cumulative Baseline Deficiencies Across PEIR Chapters 1, 2, and 3

We consider the cumulative deficiencies across PEIR Chapters 1, 2, and 3 demonstrate a failure to meet statutory thresholds. It is openly conceded within Paragraphs 1.2.4, 1.2.16, 2.2.13, and 3.2.6 that the exact route of the Bradford West Cable Corridor *“remains undecided,”* detailed route information is unavailable, and technical assessments cannot follow a standard draft ES format

By launching this statutory consultation with an acknowledged baseline survey void across the entire Bradford District utility corridor, we consider that this document fails that statutory threshold.

Furthermore, Paragraph 3.2.12 admits that critical land requirements, including land for supporting infrastructure works, ecological compensation, and Open Access/Common Land offsets—*“are under development at this point in time and therefore are not included in the figures and description provided.”* This means the ‘PEIR Boundary’ publicised to the community is fragmented and incomplete.

By consulting on a boundary footprint that omits key land parcels, while simultaneously withholding localised field data for a corridor intersecting sensitive settlements like Denholme, Wilsden, and Cullingworth, we consider it has made it impossible for host authorities, statutory bodies, and local residents to form an intelligent view.

We consider this fractured presentation in Chapters 1-3 (and within other chapters of the PEIR) fails to meet the statutory purpose of a PEIR.

Chapter 4: The Proposed Development

We note that the layout parameters presented within this Chapter are (for the reasons noted several times above) fundamentally flawed due to the missing cable connection data.

This Chapter attempts to define the physical engineering parameters, limits, and construction footprints for the project. However, because the grid connection route parameters layout (cabling route) within the Bradford District are unknown, the true scope of the physical works within the Bradford District are missing. The physical layout description cannot be considered sufficient when it excludes the physical trench widths, directional drilling pits, temporary construction compounds, and heavy vehicle delivery routes required to reach the Bradford West Substation.

We note there are generic engineering parameters elsewhere in the PEIR, such as typical trench widths, but the PEIR fails to map these elements geographically within the Bradford District. The PEIR lacks site-specific locations for horizontal directional drilling pits, construction compounds, and heavy vehicle delivery routes for the cabling route within the Bradford District.

The lack of localised, property-scale allocation for the cabling route prevents proper evaluation of spatial impacts and impacts of traffic.

By not defining these physical limits in this Chapter we consider that it provides an un-assessable scheme layout that does not fulfil the core requirements of a Project description chapter.

Chapter 5: Alternatives and Design Evolution

The evaluation framework set out in this chapter to justify the selection of the Bradford West Cable Corridor over alternative regional options is entirely undermined by the data voids noted in Chapters 1–4 above.

We would expect a reasoned account of the choices based on a comparative evaluation of actual environmental effects. Because there is no field-verified environmental, geological, or archaeological baseline surveys that have been executed along the Bradford District route segment, the claim that this route represents the optimal environmental or technical choice appears to be unproven at this juncture.

The comparative analysis appears to be based on desktop assumptions. We consider this approach renders the design evolution narrative deficient and not compliant with the directives of the PINS Scoping Opinion, which requires that the grid transmission options (cabling routes) be thoroughly evaluated using active survey data rather than abstract placeholders.

Chapter 6: Legislative and Planning Policy Context

We consider that the scope is too narrow. A PEIR should demonstrate how a development aligns with the local statutory development plans of all affected host authorities.

While this Chapter lists overarching national frameworks and national energy targets, it fails to provide a thorough, policy-by-policy compliance evaluation against the statutory local development plans of the affected host councils. Whilst we acknowledge that each technical chapter appears to reference the relevant Bradford Core Strategy policies, there appears to be no objective compliance testing in relation to the Bradford district and infrastructure within Bradford.

By isolating and locking away the actual policy compliance assessments inside a future, unreleased document (the Planning Statement), as noted in Paragraph 6.1.4, where it explicitly states: "*...compliance of the Proposed Development with relevant planning policies will be set out in the Planning Statement which will also accompany the Development Consent Order (DCO) Application, separate to the ES.*" arguably

prevents Bradford Council and local communities from understanding whether the scheme is in accordance with or not the Local Plan during this active consultation window.

Additionally, there are no references to the adopted Bradford Waste Management DpD 2017 and limited references to Bradford's adopted Replacement Unitary Development Plan 2005. Whilst it is acknowledged that substantial elements of the RUDP have been superseded following the adoption of the Bradford Local Plan Core Strategy, the RUDP has not been wholly revoked. A significant number of policies and land-use allocations have been formally 'saved' by the Secretary of State and remain legally active. Consequently, the RUDP continues to form a statutory component of the Development Plan for the district. It remains a live material consideration, and we consider that it must be recognised and evaluated within the context of this assessment.

Furthermore, there is no regard given to the emerging Bradford District Local Plan or localised moorland protections, nor recently adopted SPDs, including a new Landscape Character Assessment SPD adopted in March 2026, for which there is specific text relating to wind energy developments.

Local planning policies are designated as 'important and relevant' matters that dictate environmental significance thresholds. By presenting a legislative context chapter that relies almost exclusively on national generalities, referencing the policies in the individual chapters, but not thoroughly testing the development against the local policy of the affected host councils, we consider that it fails to meet the statutory purpose of a PEIR.

Chapter 7: Methodology for the Preliminary Environmental Information Report

We consider that the baseline and assessment methodologies set out within this chapter confirm that the environmental information underpinning this PEIR consultation is fragmented, unequal, and likely non-compliant.

Paragraph 7.6.5 openly admits that *'the focus of the baseline data collection activities has been on the Turbine Area to date, with a more high-level set of technical baseline data collected for the Access Routes and Bradford West Cable Corridor.'* This is compounded by Paragraph 7.8.2, which confesses that there is a *'greater level of information for the Turbine Area compared with..'* the Bradford grid infrastructure footprint.

Again, we note these admissions are not in line with PINS Scoping Opinion which mandates an up-to-date, proportionate baseline survey for the *whole* of the proposed development. A 'high-level' desktop overview is completely inadequate to assess the significant trenching and construction impacts across the Bradford District.

Furthermore, while Paragraph 7.14.1 notes that the project sits directly within the South Pennines Special Area of Conservation (SAC) and Special Protection Area (SPA) requiring strict Habitats Regulations coordination. We consider a vital Ornithology Report, withheld from the public domain due to confidentiality, was only shared with Calderdale Council on the 22 May 2026, but not with Bradford Council,

We consider withholding ecological baseline data until this late stage creates issues for the host authorities and prevents them being able to easily fulfil its statutory duty to evaluate the scheme's impacts on the SPA, arguably invalidating the legitimacy of the Chapter 7 methodology.

Chapter 8: Biodiversity

We note again that that there are no physical baselines for the Bradford West Cable Corridor, relying entirely on desktop abstractions and aerial photography to predict impacts on priority habitats (including blanket bog and fens) it is not considered to be in accordance with PINs Scoping

The comments (in italics below) are from our in-house Ecologists.

International and National Protected Sites and Irreplaceable and Priority Habitats South Pennine Moors SAC/SSSI

Blanket bog is irreplaceable and of international importance.

Compensation for blanket bog and other habitat losses will need to be very extensive and it is unclear whether adequate opportunity exists to restore blanket bog enough to compensate. It is our opinion that compensation must be delivered in the South Pennines to appropriately compensate for the loss to wildlife habitat, ecosystem services and the people of West Yorkshire and beyond.

Hydrology

Whilst we have not reviewed the hydrology and peat chapters. It seems that the 10m Zol for impacts on peat used in impacts assessment is not based on site specific conditions. A more robust method should be used when setting the Zol and assessing these impacts.

Recreation –

The 50m buffer for recreational impact is too small in our judgement. The prevalence of cycles and powered cycles means recreational impacts have significant potential to extend beyond that.

Wildfire

It would appear that the combined impacts of draining of the peat and/or cessation of grouse moor management and recreation pressure increase will have on wildfire risk has not been appropriately considered. This has the potential to impact huge areas of contiguous moorland.

National Nature Reserves (NNR)

Bradford Pennine Gateway NNR:

Omitted from the PEIR assessment and habitat mapping. NNR is located ~3 km from the site. The PEIR does not address this national site or impacts on it and therefore the document is not complete and does not assess the potential for impacts on conservation objectives and public enjoyment of nature.

Raises questions about the source, age or reliability of the data if the NNR is missed.

Habitats

Rivers

There is no river survey data despite a predicted 41 river crossings. No MoRPH or other survey data has been collected. NO assessment of the river crossings used for access and whether existing structures are adequate or will require additional impacts on rivers to improve bridges.

This seriously undermines the PEIR and its suitability for this consultation as we are unable to comment on the survey methods or the quality of the data.

Habitat Mapping Issues

We have identified some discrepancies between data sets used for the PEIR and those available on MAGIC. As such a review of the level of detail used to inform the desk study and any resulting surveys is needed to ensure robustness.

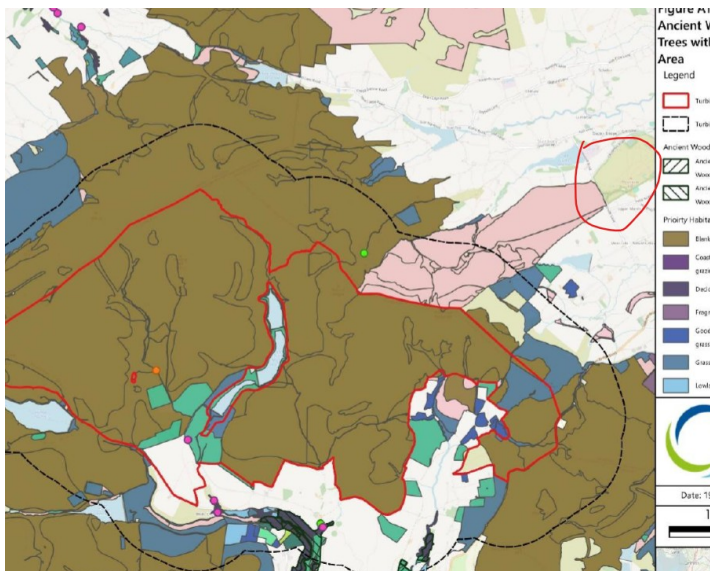
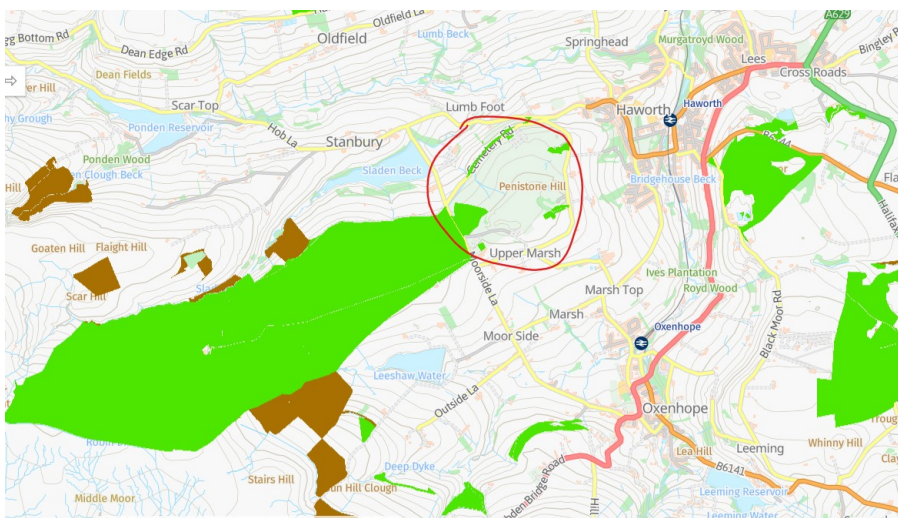


Figure A1.3 Priority Habitats – appear to be some discrepancies in the mapping



From MAGIC – Upland heathland

Gaps/ Missing Information

The Biodiversity Chapter of the PEIR does not include a geographical scale of assessment of impacts unlike the Ornithology Chapter in accordance with CIEEM guidance. This is an omission that should be rectified and undermines this document's suitability.

There is no detail on mitigation proposals

“Given the sensitive nature of the habitats and species present, a comprehensive mitigation and compensatory package will be required to address the predicted impacts. These are being developed by the Applicant with consultation with relevant consultees and stakeholders. These measures will be designed to reduce the magnitude of the predicted impacts. Mitigation and compensatory approaches will be developed and submitted as part of the Environmental Statement (ES).”

***Limited or no survey data** for the Bradford West Cable Corridor. It is our opinion that the PEIR cannot adequately be used for this consultation without this information. There is survey information missing for all habitats and species along these routes. The cable routes are scoped in in the NSIP scoping opinion so should be covered in this consultation. As such it does not comply with the scoping report.*

No River survey data.

Biodiversity Net Gain

No Biodiversity Net Gain Information is provided so the approach to this element cannot be commented on in this consultation.

*The PEIR misrepresents BNG as projects impacting irreplaceable habitat **cannot deliver BNG**. BNG can be provided for other habitats but not the whole scheme.*

*Losses to irreplaceable habitat **MUST** be compensated for through bespoke mitigation strategy.*

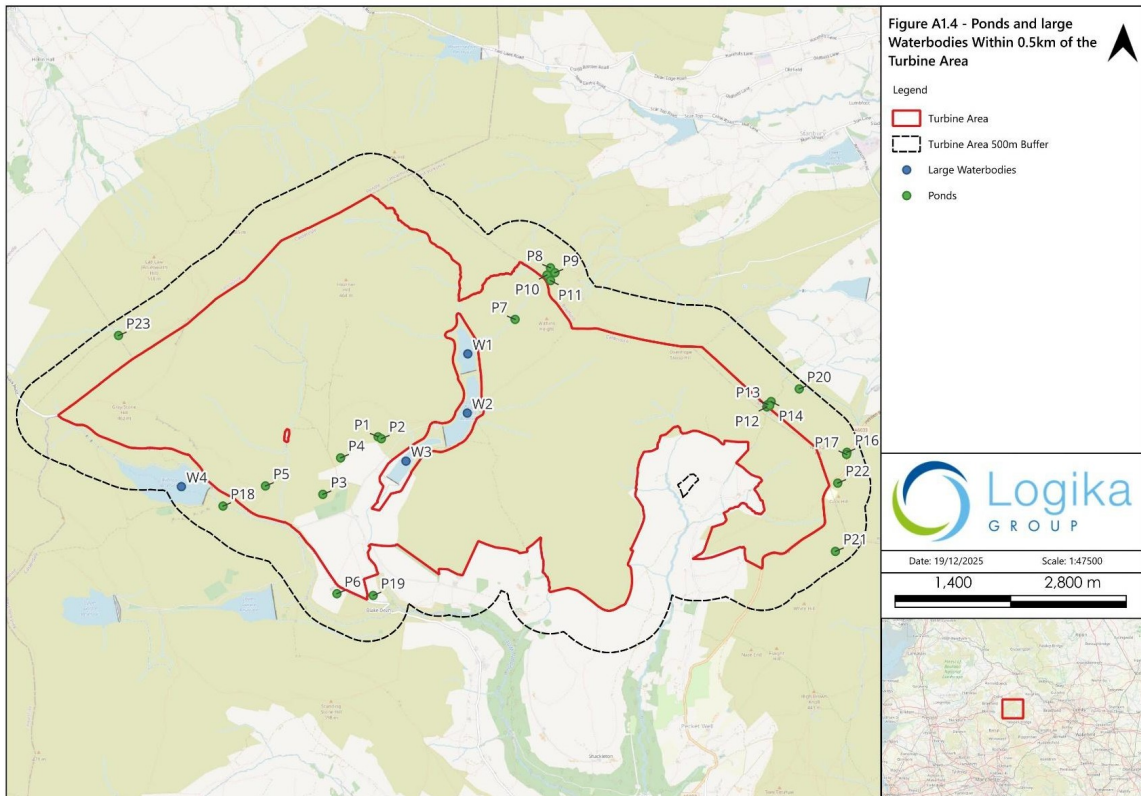
Species and Protected Fauna

Amphibians

Great Crested Newt (GCN):

Inadequate survey effort on the moor, missing ephemeral ponds which may persist in some years or until amphib have metamorphosed and moved onto land.

Surveys conducted late season on a reduced number of ponds, undermining the reliability of the data significantly. One positive result and two inconclusive from eDNA surveys suggests presence in a larger area than identified.



Desk study map showing all identified ponds

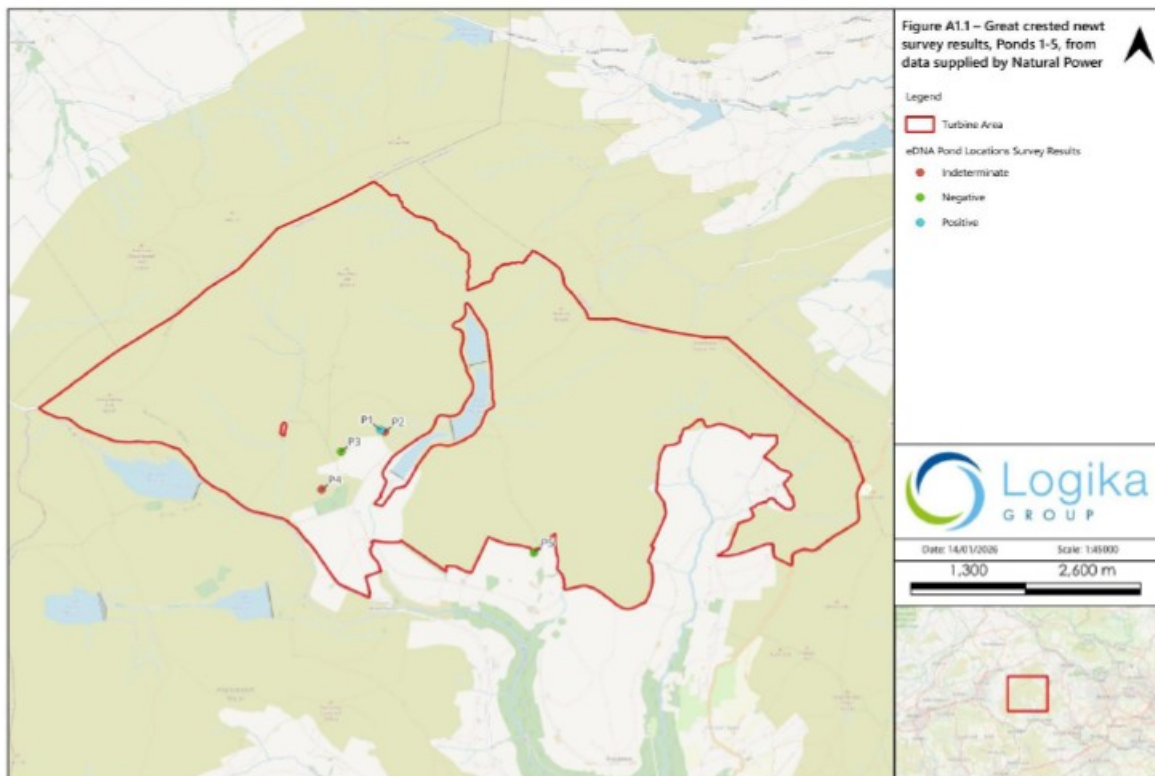


Figure A1-1: Great crested newt survey results, Ponds 1-5, from data supplied by Natural Power.

Above is Terrestrial ecology map showing the ponds surveyed.

As with all ecological receptors there have been no amphibian surveys along cable route.

Reptiles

Adder:

We are concern that survey methods (artificial refugia) may not be effective for this species. Further targeted surveys should be carried out.

Bats

*No data for **access routes or cable corridor**.*

Survey limitations (access constraints not accepted).

- *Lack of night vision surveys for roosting/swarming.*
- *Impacts underestimated:*
 - **Watercourses important for commuting** not considered.
 - *Indirect habitat degradation not fully assessed.*

Mammals

Water Vole

*One potential burrow recorded but **no targeted surveys have been undertaken** despite suitable habitat and indication of presence.*

Otter

Same issues as water vole; no targeted surveys.

Badger

Scoped out given the need to include the access and cable routes we consider potentially significant effects on badger in suitable habitat along undefined routes.

Fish

No surveys have been conducted. River crossings and culverts may obstruct passage and mitigation may be required with work taking place outside spawning. This assessment is therefore considered premature without baseline data.

May also be impacts due to changes in water quality and hydrology resulting construction.

Impacts not assessed.

White-clawed Crayfish

***No surveys undertaken.** Impacts from river crossings and culverts and may also be impacts due to changes in water quality and hydrology resulting construction.*

Impacts not assessed.

Invertebrates

Inadequate survey effort for terrestrial inverts and no survey for aquatic inverts (see white-clawed crayfish

*Only a **late-season snapshot** for terrestrial*

No impact assessment.

Fungi (CHEGD assemblages)

Survey limitations acknowledged but not adequately addressed. eDNA sampling should have been employed used to avoid the seasonal uncertainty. The single-visit survey means there's a high likelihood of species being missed

Chapter 9: Ornithology

We note again that the that there are no physical baselines for the Bradford West Cable Corridor, the complete lack of physical ornithological field survey data along the 9.5km Bradford West Cable Corridor, relying strictly on high-level desktop screens and speculative interpretation for a major infrastructure link it is not considered to be in accordance with PINs Scoping.

The comments (in italics below) are from our in-house Ecologist.

Overall the significant effects predicted on West Yorkshire's most important nature conservation area of huge value, and more potential value if restored in line with the Walshaw Moor Estate Catchment Restoration Plan, to the population of a nature depleted part of the Yorkshire, characterised by impacts on the breeding bird population and sites designated for breeding birds puts into serious question the wisdom of these proposals especially without any clear mitigation measures proposed.

Appendix 9-2: Ornithology Data Document.

This document is confidential, but it has not been shared with all consultees.

Baseline Report

No surveys of the cable route. Where route will go through in-bye grassland (a Bradford bap habitat) or other suitable grassland there is potential for impact on foraging land for golden plover. This could have implications for the habitat regulations assessment for these elements...although only temporary loss of habitat for cable routes

Missing Data

There is no detail on the collision risk modelling for any species as:

"A detailed CRM exercise following NatureScot guidance (see Appendix 9.1: Baseline Ornithology Report for rationale of using this guidance) will be undertaken and presented in the ES once the candidate turbine specifications are finalised. At this stage it is therefore not possible to quantify collision mortality rates."

The abstract assessment of the impact on each bird species, whilst in line with EIA and ECIA methodology and based on precautionary assessments, doesn't provide empirical assessments. In some cases we dispute the assessments made and these are set out below.

The calculations of number of bird strikes for target SPA species, raptor, waterfowl and other species is missing. Hard to assess the impacts on SPA/SSSI and bird species without this data, it also means we are unable to assess the calculations.

This data is essential when calculating percentage of SPA breeding populations affected. The number of birds affected is also an important statistic to be understood. Unclear why this couldn't have been provided at this stage given the size of the turbines is already established.

Nocturnal transect surveys cover February to April 2024, June 2024 and June to July 2025. Surveys should be undertaken throughout the active period for golden plover with one survey in each of April May and June and ideally July (although not required by WYE SPA methodology). Considering the relatively low potential impact of these surveys on other nesting birds (a pair of surveyors once a month walking a previously defined route) there should be no issues with access.

Based on the data provided and the status of merlin for the SPA it is our view that the Residual Impact on merlin should be assessed as International – EIA says national

Based on the data provided and the status of golden plover for the SPA it is our view that the Residual Impact on golden plover should be assessed as international scale impact, national at least – EIA says local – regional

No species-specific nightjar surveys have been carried out. This was raised in our scoping response. As a nocturnal species these may have been picked up during golden plover surveys but the habitat for foraging golden plover and nightjar habitat does differ.

Mitigation

No detail on mitigation is provided. This is also the case in the Biodiversity Chapter. Restoration of breeding habitats to compensate for losses. In the absence of detail about mitigation, the assessment of residual effects in the PEIR is more or less redundant. Throughout the PEIR ecology/ biodiversity chapters this lack of detail on mitigation is a serious flaw in this consultation. Consultees are unable to comment on the location, type, extent, feasibility or suitability of any potential mitigation

Chapter 10: Hydrology, Hydrogeology, Geology and Peat

We note again that the that there are no physical baselines for the Bradford West Cable Corridor, restricting physical field surveys for peat depth, GWDTEs, and private water supplies exclusively to the Turbine Area—while relying on high-level desktop assumptions for the 9.5km Bradford West Cable Corridor.

The comments (in italics below) are from our LLFA.

The LLFA note the proposed wind farm is located within the Calderdale District boundary, and the land contours appear to indicate that the watershed boundary corresponds with the district boundary at this location. As such, the proposed development is highly unlikely to have any adverse flooding impacts within Bradford.

The topography of the proposed development site is such that the existing surface water runoff is directed towards the Walshaw Dean Reservoirs. This is unlikely to change post development and the PEIR has identified potential impacts on the numerous drainage channels which flow down, towards the reservoirs. The report also states that these impacts will be mitigated as far as practicable. I am not an expert in this field, and I would have thought that a method statement – and possibly a watching brief, may need to be incorporated into any planning conditions, especially during construction.

In terms of surface water drainage, it is unlikely that any attenuation storage will be required, given that the receptor will be the reservoirs, however, it is likely that a surface water drainage scheme will be required, in order, to minimise the risk of pollution to the reservoir. I am thinking here in particular about the drainage for the new access road(s).

It will also be necessary for any planning permission to include a Temporary Drainage condition for the construction phase. I suspect that most of the adverse impacts will be felt during construction.

I am unable to comment on the hydrogeological impacts because this is outside my area of expertise, but I suspect that that the impacts are going to be minimal, given that the percentage impermeable area of the site will not change significantly post development.

Bradford Council has limited expertise and resources with regards other matters in this chapter, including Hydrogeology, Geology and Peat, and is therefore not able to provide any further comments at this juncture.

Chapter 11 – Carbon and Climate Change

We note again that the that there are no physical baselines for the Bradford West Cable Corridor, by evaluating localised carbon budget impacts exclusively against Calderdale metrics, the PEIR presents a geographically skewed and what we consider to be a non-compliant assessment of cross-boundary environmental effects.

Bradford Council has limited resources and expertise for matters within this Chapter and is therefore not able to provide any further comments at this juncture.

Chapter 12 – Landscape and Visual

We note again that the that there are no physical baselines for the Bradford West Cable Corridor, it appears to have been scoped from active landscape character and visual testing. Deferring the evaluation of physical landscape severance, mature tree removal, and layout-reinstatement scarring to a post-consultation Environmental Statement (ES) is not considered to be in accordance with PINs Scoping.

The comments (in italics below) are from our in-house Landscape Team.

The PEIR does look to have considered the key issues and has follows the most recent technical guidance. A significant amount of additional detail will be required in

the full Environmental Statement. There are several areas where additional assessment is required but this is referenced where required.

The documents do look to have considered the scoping report and feedback from consultees where appropriate.

Baseline and Methodology

- **Adequacy of baseline landscape character assessment.**

This looks to be appropriate and addressed consultation feedback. Additional detail is required for the full assessment. The study area of 45km is suitable. The assessment does include discussion of the literary associations with the landscape and recognises its importance. Appropriate reports have been consulted including national and local landscape character assessments.

The detail scale plans for the ZTV are helpful in providing a finer grain of detail however some plans including figure 12-5-4a are still lacking enough base plan detail to reliably locate features. Higher resolution plans are required to allow place names to be read.

- **Identification of landscape designations and sensitive areas**

The list of designated landscapes and sensitive areas of national and local significance have been identified and are appropriate for the scale of development. However, I would expect the most significant impacts to be within 10km of the site and as such additional detail should be provided to show these areas in finer detail and I would expect more thorough analysis of impacts within this range.

- **Viewpoints selected and justification for their inclusion**

The viewpoint selection is appropriate. The turbine numbers are incorrect on Figure 10-6: Blade Tip Zone of Theoretical Visibility however later versions look to have been corrected. The selected viewpoints look to be appropriate and pick up on sensitive receptors where view of the site is possible.

It is noted that there are fewer viewpoints to the northwest of the turbine area at distances within 10km and where the ZTV indicates visibility of turbines.

Additional Viewpoints- Regarding the proposed electrical connection to the West Bradford substation and possible visibility of the wind turbines shown in the ZTV I would suggest a viewpoint is added to the southwest of Wilsden (ZTV indicates 22-28 turbines visible. This may demonstrate intra cumulative impacts between the electrical connection and wind turbines together with inter cumulative impacts with other development such as BESS proposals.

It is also noted that there is a large area around Grey Stones Hill (north of Greystones Lane) that has visibility of 29-34 turbines and is within 10km of the turbine area but has no viewpoints. Bridleway Keighley 24 and a large area of CROW access land in this area should be considered as an additional viewpoint due to its visibility of the main turbine area, distance to other viewpoints and the sensitive nature of access land.

- **Clarity on methodology, assumptions, and limitations**

The methodology is appropriate and includes the most up to date literature and guidance. The study area of 45km (15km for landscape effects) is appropriate and should be ample for assessment of landscape and visual effects.

Figure 12-5-4a is extremely important and generally very useful but the scale is such that it is difficult to identify place names and precise locations. I would suggest that this and several other drawings are checked to ensure the base mapping is readable.

Residential Visual Amenity - This is a key issue and I do agree with the approach that this be undertaken for properties within 2km of wind turbines as outlined in Landscape Institute Technical Guidance Note 2/19. Viewpoints look to be representative of the area in question.

- **Alignment with relevant landscape guidance**

It should be noted that a revised CBMDC landscape character assessment was formally adopted in March 2026. The report does refer to this assessment whilst it was at the consultation stage in anticipation of its formal adoption. That's assumption was correct.

Residential Visual Amenity - This is a key issue, and I do agree with the approach that this be undertaken for properties within 2km of wind turbines as outlined in Landscape Institute Technical Guidance Note 2/19.

An Environmental Colour Assessment (ECA) should be undertaken to inform the mitigation strategy. The Landscape Institute Environmental Colour Assessment Technical Information Note 04/2018 can offer guidance on a suitable approach.

The report does reference the Landscape Institute Technical Guidance Note TNG 02-21 'Assessing Landscape Value Outside National Designations' has been cited but should be used to accurately assess the value of key landscape areas that are not designated in some way. This would include areas such as Howarth and Oakworth Moors. As mentioned below this could help capture the importance of the literary associations of the Brontes.

Likely Significant Impacts

- **Preliminary assessment of landscape and visual effects (construction and operation)**

I generally concur with the initial findings regarding the landscape and visual effects on Landscape in relation to the most significant effects being widespread and of most significance within 10km of the site.

Effects on nationally designated areas- The summary is realistic, with the sensitivity of designated landscapes being offset by distance from the closest turbine. The conclusion that there is a risk of significant effects at the Forest of Bowland (10km) but less so at other more distant landscape areas such as the Yorkshire Dale National Park) is realistic. I would expect more attention to be paid to the Forest of Bowland than more distant designated landscapes.

Effects on locally designated areas- The report concludes that there would be a risk of significant effects at locally designations locations such as the Special Landscape Area of the Northern Calderdale Moorlands.

Effects on visual amenity of settlements and dispersed properties- Whilst complex the initial findings in impacts being varied but with significant impacts in certain locations is likely to be correct. Topography in the area is likely to lead to highly variable visibility depending on elevation and aspect. As such effects on the settled valley are less likely to be significant particularly to the south of the turbine area.

Effects on visual amenity at PROW- The finding that the visual impact upon on PROW within 5km of the site would be significant is likely to be the case. PROW are particularly important and sensitive receptors in the area and attention should be given to them. I agree with many of the consultee comments that that key routes should be assessed in particular detail, with consideration of sequential views such as on the Pennine Way and Bronte Way.

Within the Bradford district, significant adverse effects are most likely to occur in the Worth Valley due the proximity of the site and orientation of the valley towards the wind turbines. This includes viewpoints 8 Bronte Way Howarth Moor, 10 Oxenhope, 11 Peniston Hill Country Park, ,13 Stanbury. Views from Conservation areas and areas associated with the Brontes is of particular concern.

Viewpoints 25 Riddlesden, 26 Crow Nest Bingley and 27 Western Edge of Baildon, may have views of the site but due to the distances involved adverse impacts are unlikely to be significant.

There are unlikely to be any views possible from the Saltaire World Heritage Site. However, this should be confirmed.

Residential visual amenity - This is a key issue, and I do agree with the initial finding that there will be significant adverse effects.

I agree that the risk of significant adverse effects mostly relates to turbines but effects of the cable route on vegetation in areas such as Howarth Moor need to be carefully considered given the extended period that moorland vegetation takes to recover from disturbance.

It is unclear what additional electrical plant would be required at the West Bradford Substation. The area is now subject to the construction of several BESS plants and as such there is potential for cumulative impacts in that location. The details for any electrical structures together with associated buildings and fencing will be important.

In regards to 'Physical Effects on Physical Landscape Fabric' I would suggest that the permanent installation of tracks and hard standing whilst far less visible than turbines would result in noticeable changes to the area and as such effects may be significant.

- **Consideration of night time/lighting effects**

Turbine Lighting- The finding that lighting would result in significant adverse effects is likely to be correct.

Mitigation

- *Proposed mitigation (planting, screening, design evolution) and whether it appears realistic*

The approach looks to be suitable and is assumed to be an iterative approach. The tone and colour of hard standing materials should be considered as part of the mitigation strategy. Light-coloured tracks can be highly visible in the wider landscape. The colour of fencing, electrical equipment, buildings and structures will also affect the visual impact of the scheme.

It should be noted that on recent schemes where electrical plant has been proposed acoustic fencing has been specified to mitigate noise. However, this created negative landscape and visual effects. Should acoustic fencing be proposed around electrical equipment an assessment will be required to determine a suitable balance between noise and landscape effects.

An Environmental Colour Assessment (ECA) should be undertaken to inform the mitigation strategy. The Landscape Institute Environmental Colour Assessment Technical Information Note 04/2018 can offer guidance on a suitable approach.

Gaps/ Missing Information

An Environmental Colour Assessment (ECA) would help to inform mitigation strategy particularly in regard to tracks, fencing, buildings and electrical plant. The Landscape Institute Environmental Colour Assessment Technical Information Note 04/2018 can offer guidance on a suitable approach.

Details on electrical plant required at the West Bradford Substation is key to understanding the impact in a location where cumulative impacts are a risk. This would include any proposed mitigation such as acoustic fencing that could create an adverse visual impact.

Additional Viewpoint- In regard to the proposed electrical connection to the West Bradford substation and possible visibility of the wind turbines shown in the ZTV I would suggest a viewpoint is added to the southeast of Wilsden (ZTV indicates 22-28 turbines visible). This may demonstrate intra cumulative impacts between the electrical connection and wind turbines together with inter cumulative impacts with other development such as BESS proposals.

It is also noted that there is a large area around Grey Stones Hill (north of Greystones Lane) that has visibility of 29-34 turbines and is within 10km of the turbine area but is in an area with few viewpoints. Bridleway Keighley 24 and a large area of CROW access land would lead to the area being sensitive to change. As such an additional viewpoint should be considered in this general area.

Whilst references to the literary associations of the Brontes are made throughout the landscape section I feel its importance may not have been given enough emphasis. As such I would suggest that LI TGN 02-21 'Assessing Landscape Value Outside National Designations' is used to capture this. In addition a stand alone analysis of that association would be useful to address this important issue.

Cumulative Effects

- **Cumulative landscape and visual impacts**

This has been taken into account and appropriate guidance followed. The assessment has identified the West Bradford Substation as a key location for assessment of cumulative impacts. I agree with this and would like to see analysis of cumulative impacts here and a viewpoint added as described above.

Summary

The proposed approach does look to be appropriate and references appropriate and up to date guidance. The LVIA will need to use the new CBMDC Landscape Character Assessment that was adopted in March 2026.

Updates to the overall design must be reflected in all figures and assessments. This does look to have been carried out but older drawings and reports should be marked as 'superseded' to avoid confusion. Whilst the 45km study area is appropriate, additional attention and detail should be applied to areas within 10km of the site. Gaps in the viewpoint selection do appear to be present to the southeast of Wilsden and at Grey Stones Hill. The assessment of landscape visual effects looks to be realistic at this stage.

Chapter 13 – Historic Environment

We note again that the that there are no physical baselines for the Bradford West Cable Corridor, there are no physical walkover surveys, geophysical tracking, and geoarchaeological coring along the 9.5km Bradford West Cable Corridor. Relying entirely on desktop abstractions to evaluate high-value assets, such as the Ilkley-Manchester Roman Road (RR720a) and the Denholme Deer Park, it is not considered to be in accordance with PINs Scoping.

We have no in house archaeology resources or experts, but the deferring of basic archaeological field-grounding to a post-consultation 2026 window, appears to create a data void. Paragraph 13.4.45 admits that "*Field surveys, other than an initial walk over survey (of the Turbine Area), have not been conducted within the PEIR Boundary*". It appears all conclusions regarding the presence and survival of archaeological remains are purely predictive.

The comments (in italics below) are from our in-house Conservation Team

PEIR Chapter 1

1.2.4 The exact route of the Bradford West Cable Corridor is undecided. This does not enable consultees to properly evaluate impacts. The level of detail and readiness of information intended by ES stage is not stated. From a heritage perspective the lack of information could prevent fulfilment of the duties inherent with Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Figure 03.5 The mapping format is very unclear, with the relationship of the proposed route of the Eastern Access not easy to interpret against its context. This does not facilitate easy interpretation for consultees. The format of the road, width, alignment, impact on topography etc. is all unknown leaving its actual impact on the context ambiguous.

PEIR Chapter 4

4.2.4 'It is the applicant's intent to seek flexibility in the design and layout of the Proposed Development...'. This generates uncertainty and lack of clarity in possible impacts, and as to the level of information which will be available at ES stage. From a heritage perspective the lack of information could prevent fulfilment of the duties inherent with Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

PEIR Chapter 5

5.7.4 paragraph incomplete.

PEIR Chapter 13 Historic Environment

Table 13.2 Response to PINS Scoping Opinion

3.6.2 'Agreement with relevant consultation bodies will be sought through the PEIR and ongoing engagement'. No specific information is provided as to how the methodology for construction of the Bradford West Cable Corridor is to be developed and what and how information will be presented. Nor is any information presented as to how agreement is to be debated or what the ongoing engagement might comprise of.

Agreement cannot be secured when information is not available as to how the matter is to be progressed leaving the consultation ambiguous and incapable of being adequately implemented.

3.6.7 In response to PINS requiring the Applicant to seek to agree a methodology with relevant consultation bodies on how the interface between landscape, cultural heritage and tourism influences the significance of the literary legacy of the Bronte Family, it is stated that engagement has been so far undertaken with relevant consultation bodies. These are not comprehensively listed. In Table 3-3 only Historic England are identified in relation to any assessment of the significance of literary associations. It is countered that this is an inadequate and incomplete scope of consultees.

No comprehensive methodology is evident in Chapter 13 on this matter of how the interface between cultural heritage, landscape and tourism will be explored and appropriately assessed. The suggestion of 'further engagement will continue as the ES progresses' unacceptably defers the matter beyond PEIR stage affording no certainty over how this crucial matter is to be addressed and preventing understanding at consultation stage. No information is provided as to how this is to be scoped or assessed at ES stage leaving unacceptable uncertainty.

13.4.1 15-30km buffer. Omission of World Heritage Site and its Buffer Zone.

13.4.5 *Should World Heritage Sites also be included here?*

13.4.16 & 13.4.17 *Stating that assessment of potential impacts of the Proposed Development on the cultural landscape of the Brontes is presented in Chapters 12 and 17 is incorrect. Having read these, the matter is diverted to Chapter 13. In Chapter 13 the matter is inadequately considered and deferred to ES stage without any certainty as to how it will be considered. The superficial conclusion at 13.4.17 that ‘further discussion will take place with relevant stakeholders as the ES progresses’ gives no resolution on how the matter is to be assessed and unacceptably defers it to an unresolved future stage. The consultation is flawed and incomplete as a result.*

13.4.24 *reference to assets of the highest significance being World Heritage Sites, scheduled monuments, Grade I and II* listed buildings and Grade I and II* registered parks and gardens conflicts with the content of Table 13.4 where highly valued assets are split into Very High and High.*

13.4.30 *the statement that all listed buildings and registered parks have the same degree of statutory protection is incorrect. There is also no reference to World Heritage Sites in consideration of Magnitude of Effect.*

13.5.20 *Should presumably refer to Hill House Edge Lane and not High House Edge Lane.*

13.8.110 *no consideration given here in respect of the settings of the Withens Farmhouse, especially Top Withens to literary significance, and the impact on wider cultural landscape. The concluded Low magnitude adverse impact is unsubstantiated and wholly fails to adequately consider the matter. As noted earlier, proper methodologies for scoping how the cultural landscape is to be assessed have not been established so conclusions such as these are unsubstantiated and cannot be determined.*

Chapter 12 Landscape and Visual

12.3.2 Table 12-3 *The response in relation to Bradford Council as a consultee on the Scoping Documents that ‘impacts in relation to Cultural Heritage are considered within Chapter 13’ is incorrect as the matter is largely deferred from the PEIR to later ES stage without any quantifiable conclusions as to how the matter is to be assessed.*

Appendix 12-2

All wirelines should be provided with fully illustrated photomontages with the installations visualised to provide a suitable level of information to enable evaluation by all consultees. Wirelines in isolation are difficult for many to interpret.

Chapter 17 Socio-Economics and Tourism

17.3 and 17.4 *Would contend that the Study Area should specifically include Bradford MDC administrative area over and above Yorkshire and the Humber as that District includes the majority of the Cultural Heritage landscape which is a major tourism attraction for the Bradford District.*

17.8.95 *This defers matters applicable to tourism in relation to the Cultural Landscape and Bronte associations to Chapter 13. However that chapter does not adequately reach conclusions as to how the matter is to be scoped or impacts assessed. The Cultural Landscape is known to have a substantial influence on tourism in the Bradford District and more widely and greater consideration is needed as to how this is to be quantified and impacts assessed.*

17.8.97 and 17.8.98 *Would contend that the conclusions reached here, without any identified parameters of how to assess this, largely miss the point. The Pennine upland landscape within both Calderdale and Bradford Districts which would be impacted by the Proposed Development is substantially visually unchanged by modern infrastructure. That landscape is known to have influenced the literature of the Brontes and is recognised as a reason for visitors to the area who seek to experience the comparable landscape. The senses of wildness, silence, solitude and the influence of the weather all contribute to an environment which is recognisably similar to how it was 200 years ago. The Proposed Development would have a profound impact upon that ambience and landscape which has a high likelihood of influencing visitor experience and potentially on decisions to visit.*

Chapter 17 has not reached any meaningful conclusions on how to quantify potential impacts on Tourism.

The PEIR has not established how to quantify this in either Chapter 17 or Chapter 13. PINS noted the need to resolve this and that has not been addressed. The Consultation is thus inadequately informed on this matter and does not indicate how or at what stage the necessary information to enable proper assessment will be provided. This does not facilitate a comprehensive or adequate consultation exercise.

Conclusions

Besides a number of basic errors and factual inaccuracies, there are several key inadequacies identified.

Information in relation to the Bradford West Cable Corridor is not available and it is stated that methodology in relation to this will emerge at ES stage although without any indication as to the extent of information.

Stating that ‘further engagement’ on this and the matter of how the relationship between cultural heritage, landscape and tourism is to be identified and assessed will take place at ES stage and ‘agreement will be sought on this at PEIR stage’ is lacking in clarity and unacceptably defers this to future stages. Chapters 12 and 17 predominantly divert the matter of cultural heritage to Chapter 13 however it is insubstantially considered there. The issues identified render this consultation inadequate and incomplete.

Chapter 14 – Transport and Access

Due to resource issues, Bradford Council cannot offer a full Highway Department response at this juncture. We have, however, identified matters that we consider require consideration.

Paragraph 14.3.2 explicitly admits that *"no discussions have been undertaken with the relevant highway authorities due to agreements not yet being in place"*. The entire assessment appears to have been published without technical input or route verification from Bradford Council's highways team.

It is noted that traffic associated with the 9.5km export cable corridor appears to have been separated and completely excluded from the peak construction traffic flows in Table 14-10. We consider this artificially deflates the cumulative vehicle impacts across the Project area and the Bradford District.

Chapter 15 – Noise and Vibration

Due to resources within the Environmental Health Department, Bradford Council cannot offer a full technical response at this juncture. We have, however, identified matters that we consider require consideration.

We question why the West Yorkshire Planning Consultation Guidance: Noise & Vibration (2016) was not utilised. The open admission in Paragraph 15.2.1, that this document was omitted because it could not be accessed, is inappropriate. It is unclear if it was requested from any of host authorities if it was not readily available online.

Paragraph 15.4.53 states that *"traffic count data for the decommissioning of the Proposed Development is not available"*. Despite this data void, the conclusion is reached that decommissioning noise will be "Not Significant".

Abstract Baseline for Cable Corridor Infrastructure: While the text claims construction noise along the 9.5km Bradford West Cable Corridor is considered in the appendix, paragraph 15.4.27 admits that the precise plant, machinery, and daily timetables are entirely unconfirmed. Because the cable routing remains unstable and unknown, Bradford Council and residents are being consulted on abstract noise assumptions.

Chapter 16 – Air Quality

The commentary (in italics below) is from our in-house Clean Air Team

Does the PEIR provide enough information to form an informed view of the likely significant environmental effects:

- *the final alignment of the cable route corridors have not yet been finalised so we still don't know exactly which stretches of roads will be subject to cable works and how these relate to relevant receptor points.*
- *a desk top study of baseline air quality conditions has been completed but as previously identified, air quality data for the affected area is currently sparse and further baseline assessment of air quality is needed. I have had a*

conversation with some air quality consultants around what level of assessment is needed and where but no additional baseline data has been provided to date. The PEIR suggest this is currently being undertaken "4.10.12 Baseline information will be updated following ongoing air quality monitoring along key construction traffic routes, undertaken in agreement with local authorities".

- the PEIR states "Construction traffic will generate additional traffic flows on local roads, and emissions of NO₂ and PM₁₀ which could affect air quality along access routes and impact human health. More information will be provided within the ES when detailed designed and final construction figures are received however the effect is predicted to not be significant based on anticipated numbers and the application of measures to reduce the impacts of construction traffic. These measures will be included within the oCTMP." As detailed below, the current predicted levels of construction traffic are above the thresholds at which Bradford normally requires a full air quality impact assessment. In the absence of detailed information about the routing of the vehicles and proximity to sensitive receptor points it is not possible to say for certain at this stage that air quality impacts will not be significant. A full air quality impact assessment is needed to confirm this. We accept that consideration of the impact on receptors within 50m of the cable construction traffic routes and 250m either end is sufficient.

Has the applicant followed the methodologies, survey requirements, and assessment parameters set out in the Scoping Opinion:

- an air quality impact assessment for the construction phase has not yet been completed and as above exact cabling routes still undecided. There seems to be an intention to undertaken an assessment for the construction phase but as detailed before (and accepted by Bradford) not the operational phase. The PEIR states " The construction phases will result in additional traffic on the road network surrounding the PEIR Boundary. Peak construction activity occurs in Month 21 with an estimated 114 HGV movements per day and 86 LGV movements". These predicted traffic flows are above the threshold at which we normally require an air quality impact assessment so we still expect one to be submitted in due course (once traffic / cable routing is confirmed). The need for an air quality impact assessment should be screened against both the IAQM /EPUK guidance and the local WYLES guidance. At the moment they seem to be suggesting to only screen against the IAQM / EPUK guidance. When the AQ impact assessment is undertaken we wish to see predicted change in concentrations as well as % change values.

Are the baseline conditions, assumptions, and assessment methods appropriate and robust:

The PEIR states "National compliance data published by Defra indicates no exceedances of statutory air quality limit values within the PEIR Boundary. Bradford was previously identified as an area at risk of exceeding limit values and introduced a Clean Air Zone (CAZ). As a result, monitoring shows that pollutant concentrations within the CAZ have since improved and are now below the limit values. Across the

wider region, only one monitoring site in Keighley was recorded as being within 10% of the limit value in 2024".

This statement highlighted in yellow is incorrect. Whilst there are currently no known limit value exceedances within the PEIR boundary shown on Figure 16-1 there are still currently 2 points of limit value exceedance (in 2025) within the wider CAZ (on Queen's Road and Shipley Airedale Road). In 2024, there were 2 additional sites that exceeded the 40ug/m³ limit value (DT105 Manchester Road and DT191 Low Moor, Keighley). In 2024, there were also several other sites in the Bradford District that were over 36ug/m³ (within 10% of the limit value). All 2024 air quality data for the Bradford District can be viewed in the 2025 ASR report available here [2025 Air Quality Annual Status Report \(ASR\)](#). There appears to be some confusion on reporting of compliance with limit values and compliance with air quality objectives. Whilst both have a value of 40ug/m³ where they apply is slightly different so the document should read:

2024 - 4 exceedances of the limit value in the Bradford District, 6 other sites with 10% of limit value.

2024 - 2 exceedances of air quality objective, 1 site within 10% of objective

There is limited data on PM_{2.5} monitoring presented. 2 sites mentioned in Calderdale, no mention of the Bradford Keighley sites. No numerical values given for PM₁₀ or PM_{2.5}, just states 'below objectives'. Would be useful to see how far below objectives in Calderdale.

Are the predicted effects (construction, operation, decommissioning) reasonable and clearly explained:

These have not yet been fully assessed, but the suggested IAQM approach is acceptable. It should be possible to adequately mitigate construction impacts in line with the guidance.

Mitigation Are the proposed mitigation measures appropriate, deliverable, and sufficiently developed at this stage:

As above, not yet undertaken but acceptable methodology identified. "4.10.14 An updated oCEMP, oDEMP and oCTMP will be prepared to secure all required controls for managing dust, traffic emissions and NRMM during construction and decommissioning". We note the intention to apply London standards to NRMM used on the project and welcome this.

Gaps or missing information Identify any omissions that must be addressed in the Environmental Statement (ES).

As above further baseline monitoring and air quality impact assessment work is still awaited.

Cumulative effects

Not yet clear what other developments might need to be or are intended to be considered in the air quality impact assessment work for the construction phase. This will depend on which roads are likely to be impacted by the construction / cabling works and their relationship to other development in the areas.

Chapter 17 – Socio-Economics and Tourism

We have noted there is no standalone economic impact modelling for the Bradford District. We are concerned that aggregating GVA and employment data into a macro-regional baseline masks the true distribution of construction costs, traffic delays, and local supply chain allocation within our district boundary. There appears to be no explicit justification or logical explanation in the text for why standalone economic impact modelling was omitted for the Bradford District.

There are significant concerns that visual degradation of the Brontë cultural landscape is acceptable because tourists can "*choose alternative itineraries*" (pp. 42-43). Deflecting visitors away from the historic core of Haworth and the Brontë Way directly threatens the local visitor economy and conflicts with the Economic Strategy for Bradford District 2018-2030. Issues related to Tourism are noted further (below) by the Tourism Team.

We also understand the Inspectorate explicitly ordered an assessment of the impacts on Common Land and Open Access Land. We consider the statement that "*Further information on common land and open access land will be provided at Environmental Statement (ES) stage*" is deferring the loss of public recreational assets to a future date and it is not quantified to any level during this public consultation.

The comments (in italics below) are from our in-house Tourism Team

Tourism Impact Assessment

There is a reliance on data from Scotland, with no clear detail on how similar these developments are to the proposal.

On assessing the impact on Tourism there is a reliance on Calderdale Tourism Strategy. However Haworth, the key visitor destination adjacent to this site is in Bradford and therefore would not be included within the Calderdale strategy.

There is a complete lack of evidence based reporting on the tourism impacts on the area around Haworth which falls under Bradford Metropolitan District Council.

As referenced from the West Yorkshire LVEP Destination Management Plan, a key strength of the attraction of West Yorkshire to visitors is:

- *West Yorkshire is part of the Yorkshire brand including a sense of place, particularly in Pennine West Yorkshire, enhanced by TV and Film Locations and literary connections.*
- *Attractions including cultural and historical sites of international stature*

The Energy Park development should be seeking to understand and measure the effect it could have on these key pillars of the visitor experience in West Yorkshire.

Outdoor Activity Tourism

This has not addressed the 'why' around visitors taking part in outdoor activities in this particular area.

The combination of visitor facilities, especially in Haworth, with accessibility to open access countryside provides a strong offer to visitors. This area is close to very highly populated areas, the conurbation of Bradford and Leeds and Greater Manchester and is well served by public transport.

It would be valuable to ascertain whether the change the energy park would bring would intrinsically change the attractiveness of the place and the socio-economic effects this would have on existing and potential visitors as well as the local economy.

In addition, there needs to be an assessment of potential impacts to the accommodation sector. Unserviced (self-catering / Airbnb) accommodation has seen significant growth in recent years. It would be useful to map these locations and identify if the Proposal could affect their attractiveness.

TV, Film and Literary Location Tourism

A key aspect of the landscape around Haworth is its association with the Brontë Sisters, as a location which inspired and influenced their work. An assessment needs to be made around the cultural significance of the landscape, how this influences visitor numbers to the area and how the Proposed Development would affect this.

All the statements below require evidence and further work before these can be accepted.

17.8.93

- “Brontë Country covers a large region east of Manchester, north of the Peak District and west of, and including, Bradford and Leeds”*

17.8.97

- “the main driver of motivations to visit literary sites is the connection to the author's work, and this will not change as a result of the Proposed Development.”*

17.8.98

- “there are a wide range of alternative places associated with the Brontës that visitors could include in their itineraries instead”*

Haworth and its surrounding landscape continues to take a leading role in attracting visitors to the area.

From [To Walk Invisible - The Open University](#) filmed on location, to the 2026 film ‘Wuthering Heights’ featuring Margot Robbie and Jacob Elordi filmed in North Yorkshire. TV and Film adaptations continue to raise the profile of the area, bringing increased press and social media influencer interest to Haworth and ultimately more visitors.

In 2026 VisitBradford has supported multiple press visits from Italy, Denmark, Germany, Canada and UK. With journalists wanting to incorporate the moors surrounding Haworth into their visit to experience ‘the real’ Wuthering Heights.

The comments (in italics below) are from our in-house Public Rights of Way Team and relate to this chapter and Chapter 14.

Wider considerations:

Effect on recorded network of public rights of way from construction, siting of turbines and other infrastructure and effect on changes of patterns of water on site – run off/drainage etc that could cause damage.

Visual impact

Opportunities for wider access – new access tracks to facilitate development are likely to be used by the public for easier access to previously inaccessible moorland. This brings opportunities and risks – opportunities include an easy to navigate route, even dry surfaced, accessible to a wider range of users (pushchairs, trampers, etc) but the risks include – disturbance from dogs to nesting birds, dog fouling, increased fire risk, litter, negative visual impact and loss of wild spaces.

.....

The impact in Bradford on the rights of way network is primarily around the work that will be required for the cabling and until that is determined, we cannot really comment in detail on that aspect.

We note that much of this work will be done by underground methods, with open ditching as required. Our advice on this generally would be met by our usual comment to planning applications which I will add at the end.

Bradford is a location which enjoys significant benefit from the outdoor recreation in the uplands and boundary area to Calderdale, with significant cultural value to the moorlands and the association with the Bronte connection.

National trails and feeder routes also cross the Bradford/Calderdale boundary and will be impacted by this potential development, and this is noted in the PEIR report. The cultural value and how this is assessed has been picked up by the Tourism Officer.

National Trails have a remit to be routes in the highest quality landscapes possible and to also meet 4 key quality standards.

<https://www.gov.uk/government/publications/national-trails-management-standards/national-trails-management-standards>

Experience

The trails should be managed in a way which allows as many people as possible to enjoy a wide variety of walking and riding experiences along National Trails and through the English landscape.

Enhancement

Constant improvements should be made to the trail and its associated routes. It should contribute to the enhancement of the landscape, nature and historic features within the trail corridor.

Engagement

Build and sustain a community of interest in caring for the trail and the landscape through which it passes.

Economy

The trails should create opportunities for local businesses to benefit from the use of the trails.

A small section of the Pennine Way and the feeder route to the Pennine Bridleway – the Calder Aire Link are within Bradford.

The PEIR report has identified these routes. I would expect both Calderdale Council and the National Trails Officer will make more detailed comments on the scope of the report to these elements.

There is a question to answer if the visual amenity of these routes will be negatively affected by the proposed development.

It is considered equestrians are vulnerable users and thus the impacts on them must be given careful consideration and any opportunities to reduce network fragmentation would be valuable.

One area that the PEIR report has not addressed, and it may be covered by the next stage of the process is how the development could provide enhancement to the public rights of way network.

This development is largely in an area of designated Open Access Land, to which the public already has the right to roam freely. Presently the extent to which that is exercised is limited by the nature of the terrain.

However, the construction of access tracks to construct and service new turbines, will provide a way for a considerably wider range of non-motorised users to get to this remote place. Given that this is Access Land, it may not be possible to restrict the public from using these tracks.

The applicant also needs to consider the impact of other legislation on the construction of tracks. Use of a track in this situation – physically engineered and open to the public could lead to rights of access being gained – the fact that this is open access land would not protect against that and a landowner would be advised to look into legal protections to prevent rights from being gained and serve a Section 31(6) declaration and plan on the local Authority (Bradford, Calderdale and possibly Lancashire CC).

This presents both opportunities but also potential drawbacks to the wider landscape. A surfaced track in an area of rough moorland will allow a much wider range of use – less experienced walkers, cyclists, wheelchair and tramper users and so on. This will allow the experience of an upland environment to be available to a wider range of people and may enhance public engagement.

The report mentions decommissioning – will the access tracks be left in situ for use by the public? Who would maintain them in future?

There is a tool, developed by Exeter University <https://leep.exeter.ac.uk/orval/> which can be used to map a potential route and show an estimated cost benefit and also the number of additional car journeys it would generate.

The potential drawbacks would include increased fire risk, disturbance of birds and other species – especially from dogs, litter and fouling. All of which could be severely detrimental. Another potential issue would be how these works affect water run-off and drainage and if this would affect any recorded rights of way. These points do not seem to be addressed in the PEIR.

Chapter 18 – Human Health

Chapter 18's reliance appears to be on unverified desktop outputs from other chapters they may be deficient. Because the core transport, air quality, and noise chapters have failed to conduct physical baseline monitoring along the 9.5km Bradford West Cable Corridor, the health assessment conclusions regarding exposure levels for Bradford are considered to be unproven.

The PEIR notes at Paragraph 18.5.2 that health sensitivities are significantly elevated in the Thornton and Allerton Ward. Despite acknowledging this baseline vulnerability, there appears to be no quantitative Health Impact Modelling or present localised mitigation, ignoring the health protection thresholds set out in the Bradford Core Strategy.

There is concern regarding procedural prematurity regarding stakeholder engagement. There appears to be a completed set of health significance conclusions while simultaneously admitting in Paragraph 18.3.2 that no direct consultation has taken place with Bradford's Director of Public Health or the West Yorkshire Integrated Care System (ICS).

The PH Team (below) has noted and welcomed the intention to consult Bradford's Director of Public Health, they have also noted the health and social inequalities of Bradford, and that some population groups will experience multiple, overlapping forms of deprivation and inequality. However, as the direct consultation with these Bradford stakeholders has yet to take place, it is again considered that the PEIR process is flawed. It is questioned whether the pre-application process can progress until a collaborative Health Impact Assessment (HIA) framework is active.

The comments (in italics below) are from our in-house Public Health Team

Based on investigations and modelling to date, the Non-Technical 'Preliminary Environmental Impact Report (PEIR) has categorised the impact on Human Health as having:

"Likely significant effects (which) cannot be ruled out until further assessments are carried out and are therefore presented as significant within this PEIR." that may be generated by the Proposed Development. Calderdale-Energy-Park-PEIR-Chapter-18-Human-Health.pdf

The PEIR lists the following Bradford District settlements as lying within 5 kilometres of one or more of the following elements of the site:

The Turbine Area - Oxenhope, 2.5km.

The Eastern Access route - Oxenhope, 1km, Denholme, 3.8km;

Bradford West Cable Corridor - Denholme, 0.3km; Wilsden, 0.6km; Cullingworth, 1.2km; Oxenhope, 1.2km; Thornton, 1.9km, Allerton, 2.2km; Harden, 2.7km; Bingley, 4.3km.

Notably Oxenhope lies within 1.0km – 2.7 km of all 3 major elements of the proposal, which calls for detailed consideration of potential impacts, particularly during the construction period.

NB This list omits mention of Worth Valley, which is otherwise referenced throughout the document.

My response to Chapter 18 of the PEIR - Human Health, which outlines the proposed scope of the Environmental Statement, is as follows:

I welcome the intention to:

-consult with the Directors of Public Health for Bradford District and other affected local authorities, and with the West Yorkshire health and care system - the WY NHS Integrated Care Board.

- consider appropriate local and national policy documents as listed in Chapter 18, and to base consideration of health impact on local and national sources of health data, including our local JSNA.

- consider the potential for environmental interventions to impact the health and wellbeing of communities, given existing disparities in health status and health outcomes between different communities in Bradford District. As noted in the Health chapter, these are often correlated with deprivation and wider inequalities - for example in respect of housing condition, employment, transport and access to green spaces.

Please ensure that:

- Public Health is consulted further on issues that have been scoped out of the Environmental Statement. I have concerns about some of the issues that have been scoped-out at this early stage, whilst environmental investigations are ongoing. Based on current information we do not agree to or support this decision.

- I am consulted further to ensure that all relevant, local documents are included in the Environmental Assessment for the health domain.

- I am kept informed of any further information about the potential impact on Air Quality during the construction phase, and any further Air Quality related impacts or potential impacts that are identified during further environmental investigations.

- all 2010 Equality Act characteristics are considered in full. Ethnicity is of particular relevance to Bradford, given the ethnic diversity of our District population; and age given that our large youth population and also an ageing population.

- that both of Bradford District's locally adopted Equality characteristics are considered. Chapter 18 addresses one of these (low-income) but does not appear to consider our second additional equality characteristic of 'care leaver'/care-

experienced', as a population that also experiences considerable health and social inequalities.

- *assessment of health and social impact considers that some population groups will experience multiple, overlapping forms of deprivation and inequality.*
- *the Bradford District and Craven Health and Care Partnership is also consulted.*

Chapter 19- Aviation and Radar

We do not have any in house expertise, nor available financial resources to appoint such expertise. However, we would note the following:

Table 19-4 reveals that formal engagement with the MoD has resulted in a confirmed intention to object due to severe unacceptable radar impacts on BAE Systems Warton. We are concerned that consulting Bradford Council and the public on a layout that faces a regulatory objection is not in accordance with the principles of a PEIR.

Chapter 20- Major Accidents and Disasters

We note the omission of localised data within this Chapter. Relying on placeholder text to defer active ground subsidence data, high-pressure utility line safety layouts, and severe flood risk modelling across the 9.5km Bradford West Cable Corridor to a post-consultation ES phase is not considered to be in line with the expectations of a PEIR.

In particular stating at Paragraph 20.4.17 that *"further modelling in relation to flood risk is required... Therefore, the analysis presented in this Chapter has not covered these risk events at this stage due to the absence of available information."* We consider deferring extreme weather flood-hazard interactions to the final Environmental Statement (ES) stage creates a data void

While Table 20-4 details natural ground subsidence risks for the Turbine Area, Paragraph 20.5.15 admits that *"Further information will be obtained for the Access Routes and Bradford West Cable Corridor and presented in the ES."* The geological risk profiles along the entire Bradford portion of the development are omitted.

Section 20.5.6 identifies five Major Accident Hazard Pipelines intersecting the development land—including several Northern Gas Networks high-pressure transmission loops inside the Bradford District (e.g., Keighley/Baildon and Menston/Canal Road lines). The text admits in Paragraph 20.5.7 that *"Full details... will be provided in the ES"*, leaving active pipeline strike and explosion risks unevicenced during this consultation.

Presenting a conclusion of "no preliminary likely significant effects" is considered scientifically unrobust when it is conceded in Paragraph 20.3.3 that no direct consultation has taken place with regional fire authorities, the HSE, or Northern Gas Networks.

We also consider by isolating single risk categories and ignoring cross-cutting disaster chains, such as construction vehicle accidents triggering wildfires on highly flammable peatlands, the PEIR understates the potential public safety burden placed on local infrastructure.

Chapter 21- Shadow Flicker

Due to resourcing issues within the Environmental Health Department, Bradford Council are not able to provide a technical Environmental Health Department response at this juncture. However, we have noted a few matters for consideration.

We note there is no standalone property schedule or plan for Bradford receptors. Section 21.4.27 identifies 105 total property points within the calculated study area. While Table 21-6 outlines 37 filtered Shadow Flicker Assessment Locations (SFALs), the chapter does not appear to identify which properties sit inside the Bradford District boundary, lumping all receptors into a single, localised list.

Bradford also appears to have been omitted from the next steps, and stakeholder engagement appears to be exclusively for Calderdale Council. As a host authority, Bradford considers that we should be actively integrated into the evaluation process to confirm local receptor sensitivity and protect residential amenity.

Chapter 22- Materials and Waste

The chapter completely omits the Bradford Local Plan Waste Management DPD 2017, there is no assessment of how the project aligns with this document.

There is no quantitative data or assessment for the construction materials used or waste generated by the Access Routes. A PEIR should provide enough information for stakeholders to understand the development's impacts; leaving this out prevents a complete pre-application review.

The impacts of the development on Mineral Safeguarding Areas and safeguarded waste management facilities/allocated waste sites are omitted and deferred to the main Environmental Statement (ES). The PEIR should be evaluating whether the project will substantially sterilise minerals or safeguarded waste sites.

There appears to be no identification of specific regional or local quarries from which ground-won construction materials will be sourced, nor identification of specific regional waste recycling or landfill sites.

There appears to be no detailed quantitative breakdown of solid waste generated during decommissioning 35 years from now.

It is noted that likely significant environmental effects regarding construction materials and inert/non-hazardous waste have not been concluded because of the omitted access routes. A PEIR should seek to provide enough information for stakeholders to understand the development's impacts.

PINS Scoping Opinion explicitly stated that insufficient information had been provided regarding waste arisings across all phases. Whilst there are formulas and estimates for the Turbine Area and Cable Corridor, there omission of the Access Route waste means that this has only partially met the Scoping Directive.

Chapter 23- Other Environmental Matters (Agricultural Land and Land Contamination)

We note again that there are no physical baselines for the Bradford West Cable Corridor, there are no desk-based land contamination review or risk screening conducted for the Cable Corridor. There is no Phase 1 Desk Study and Preliminary Risk Assessment.

The Cable Corridor appears to have been explicitly omitted it, guessing that because it is rural, it has no significant history of contamination, this is considered a significant error, as there is evidence of landfill in rural areas in Bradford, particularly from historical quarries. Furthermore, agricultural contamination is a factor within the Bradford District, including the burial of carcass and other types of agricultural waste.

For contamination, we consider the reliance on speculation rather than desk-based data collection for the Bradford West Cable Corridor and Access Routes, fails to provide a robust, evidence-based preliminary assessment.

With regards to Agricultural Land this appears to be a desk based study, with no physical, on-site soil sampling or verification to validate these digital models. We consider the conclusion that unmapped areas are "*minor, non-agricultural, and would not reasonably be expected to contain higher-grade land*" is speculative and fails to provide a level of certainty. To address this, localised, physical soil augering and core sampling along the Bradford West Cable Corridor and Access Routes to ground-truth the desktop ALC classifications and definitively prove the absence of localised BMV land pockets or highly sensitive topsoil/subsoil structures should be undertaken.

The PINs Scoping noted that targeted discussions with Natural England regarding the scope of the agricultural land assessment should be undertaken. Paragraph 23.2.2 confirms that this mandatory consultation has not yet taken place. Consequently, it appears the agricultural baseline lacks the validation necessary at the PEIR stage.

Chapter 24- Cumulative Effects

We are concerned that we were not consulted on the shortlisting of 'Other Developments'. Bradford Council previously fulfilled its pre-application obligations by extracting and providing a definitive list of local planning application numbers. However, a formal, filtered shortlist of developments has neither been provided to nor agreed with this authority.

(PINS) *Advice Note Seventeen: Cumulative Effects Assessment* explicitly states that the filtering of the Long List into a Shortlist (Step 2) must be conducted in active consultation with host local planning authorities.

There appears to be no evidence that cumulative pressures affecting the Bradford West Cable Corridor and Access Routes have been adequately modelled. We are concerned that major overlapping impacts, such as construction traffic congestion on Bradford's strategic highway network or concurrent ecological disturbance near the South Pennine Moors, may have been prematurely filtered out.

The implementation of a strict data cut-off date for cumulative planning applications of 1 December 2025 (Paragraph 24.4.28) leaves a six-month data gap at the time of this consultation. Any major planning applications submitted to Bradford or adjacent Districts over the last half-year are entirely unaccounted for and it is unclear at the time of the DCO submission how this six month period, and other additional time period before the DCO submission, will be dealt with.

Chapter 25- Summary

We consider that this chapter fails to satisfy its statutory purpose as a non-technical, accessible baseline record. Rather than reflecting an environmental baseline co-designed and verified with Bradford, the summary acts as a place repository for data that has not been corroborated with Bradford. Furthermore, the widespread reliance on ambiguous placeholders, stating across multiple major chapters that 'significant effects cannot be ruled out', we believe transfers the burden of baseline verification onto the Council during a limited consultation window. This prevents both the Council and local communities from executing a meaningful review, undermining the entire front-loaded legislative intent of the Planning Act 2008

We object to the unilateral conclusions presented in Chapter 25 (Tables 25-1, 25-2, and 25-3), which dismiss all construction, operational, and decommissioning impacts associated with the Bradford West Cable Corridor as "Not Significant". There is little to no actual baseline information within this PEIR, and it has been systematically deferred to the final Environmental Statement (ES) stage.

We consider this approach completely undermines the statutory purpose of the PEIR and the front-loaded nature of the NSIP regime. By withholding the baseline data, traffic routing models etc, Bradford Council's specialist officers and local communities have been denied the opportunity to meaningfully review and shape the corridor's design. We consider that skipping the PEIR stage for a major component of the project and jumping straight to the ES is not acceptable.

Using a summary chapter to declare "no significant adverse effects" is not considered acceptable. The Council cannot verify or accept these conclusions as there are information gaps and baseline data gaps throughout the PEIR for the Bradford West Cable Corridor.

With regards to Brontë cultural landscape, we are concerned that Table 25-2 summarily writes off operational changes within the setting of heritage assets as "Minor adverse / Not Significant". We consider this entry actively obscures a structural flaw within the wider PEIR regarding the globally significant Brontë cultural landscape. A review of the underlying application documents reveals an unacceptable circular deferral: Chapter 13 claims the cultural and socio-economic

heritage impacts on the Brontë landscape are evaluated in Chapters 12 and 17. Concurrently, Chapters 12 and 17 state the exact opposite, asserting the matter is handled within Chapter 13.

This omission of data would appear to mean that no actual baseline assessment, methodology, or visibility mapping has been executed for this sensitive landscape receptor. Flattening an unassessed, highly sensitive local heritage asset into a generic "not significant" summary row is considered procedurally inadequate.

Conclusions - Overall Pre-Application and Procedural

Bradford Council considers that the Preliminary Environmental Information Report (PEIR), in its current iteration, fails to satisfy the statutory thresholds mandated by the Planning Act 2008 and the Infrastructure Planning (EIA) Regulations 2017.

We have considered each chapter of the PEIR as far as we are able with limited resources, and we would raise again the need for a formalisation of a Planning Performance Agreement (PPA). Alternately, we are likely to seek cost recovery via the statutory cost-recovery mechanisms for prescribed public authorities taking effect on 8 June 2026 under The Infrastructure Planning (Fees) (Amendment) Regulations 2026. As noted above, any continued technical progression, officer review, or specialist engagement by this Authority is contingent upon the execution of a robust PPA operated on a full cost-recovery basis, or the activation of the statutory cost-recovery mechanisms.

Nevertheless, even with limited resources we have noted a number of key matters, which relate to the Bradford West Cable Corridor and the Brontë cultural landscape.

We are concerned about the omission of field-verified survey data across the Bradford District and the deferral of the Bradford West Cable Corridor baseline to the post-consultation Environmental Statement (ES) stage.

Additionally, the logical flaws regarding the globally significant Brontë cultural landscape, we believe, these errors undermine the reliability of this statutory pre-application window. The Council and local communities have effectively been consulted on an abstract concept rather than a transparent, scientifically robust infrastructure design.

We would note the need under Section 49 of the Planning Act 2008 to take account of consultation responses. To address the procedural and evidentiary gaps identified throughout this response, the Council advises that the current drafting process should be paused. The PEIR should be updated to resolve the omitted baseline data and technical discrepancies, followed by a comprehensive re-consultation on the revised document.

Please note that if the DCO application progresses without a revised PEIR consultation, the Council will include these points within its formal Adequacy of Consultation Representation to the Planning Inspectorate (PINS).

Yours faithfully,

A handwritten signature in black ink that reads "Richard Hollinson". The script is cursive and fluid, with the first letters of each word being capitalized and prominent.

Richard Hollinson
Assistant Director (Planning, Transportation and Highways)
Department of Place